

PEFC Conformity Assessment

Polish Forest Certification System

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Client

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Contents

Acronyms.....	5
1. Introduction.....	6
1.1 Form International	6
1.2 Scope of the assessment	6
1.3 Documents and resources used.....	6
1.4 Methodology adopted.....	8
1.5 Assessment process.....	9
1.6 Report structure	10
2. Recommendation	12
3. Summary of the findings	13
4. Structure of the scheme.....	15
4.1 Introduction to the forestry sector in Poland	15
4.2 Organisation of the Scheme	16
4.3 The PFCS.....	17
5. Standard-setting Procedures.....	19
5.1 Analysis	19
5.2 Nonconformities.....	19
6. Standard-setting process.....	20
6.1 Analysis	20
6.2 Nonconformities.....	20
7. Forest Management Standard	25
7.1 Analysis	25
7.2 Nonconformities.....	26
8. Group Certification Model	30
8.1 Analysis	30
8.2 Nonconformities.....	30
9. Chain of Custody Standard	32
10. Certification and accreditation arrangements	33
10.1 Analysis	33
10.2 Nonconformities.....	33
11. Other aspects.....	34
Annex 1 PEFC Checklists	35



<i>Part I: PEFC Checklist for Standard-setting Procedures and process.....</i>	<i>35</i>
<i>Part II: PEFC Checklist for Group Forest Management Certification</i>	<i>81</i>
<i>Part III: PEFC Checklist for Sustainable Forest Management</i>	<i>102</i>
<i>Part IV: PEFC Checklist for Certification and Accreditation Procedures</i>	<i>154</i>
Annex 2 Results of stakeholder survey	160
Annex 3 Results of international consultation	171
Annex 4 Report on the field assessment.....	172
Annex 5 Internal review	173



Acronyms

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



1. Introduction

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

This report presents the results of the evaluation of the Polish Forest Certification System (PFCS) against PEFC Council requirements for forest certification schemes. The application for PEFC endorsement was submitted in May 2022.

PEFC Council appointed Form International as the independent Assessor to carry out the conformity assessment. This assessment report will be the basis for the decision of the PEFC Council and provides a recommendation to the PEFC Council about the maintenance of endorsement of the PFCS.

1.1 Form International

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

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

1.2 Scope of the assessment

The scope and process of the assessment follow the assessment of a revised system, as elaborated in PEFC GD 1007:2017 chapter 6.3.1. The conformity of the PFCS is assessed against the PEFC standards and system requirements as presented in PEFC IGD 1007:2017.

1.3 Documents and resources used

Various documents and resources were used in this conformity assessment. The documents received from PEFC Poland are shown in Table 1. Table 2 lists the documents used from PEFC Council. Besides these documents, the website used by PEFC Poland was consulted during the assessment.

Table 1 Documents used for the conformity assessment

Number	Title
PEFC EN 1001:2021	Standard-setting procedures (February 2023)
PEFC PL 1002:2022	Certification and accreditation procedures (February 2023)
PEFC EN 1004ver2:2023	Group forest certification – Requirements (February 2023)
PEFC PL 1003ver2EN:2023	Sustainable forest management – requirements (February 2023)
PEFC PL 3001:2022	PEFC Notification of Certification Bodies operating Forest Management System and/or Chain of Custody Certification in Poland (May 2022)
PEFC PL 3002:2022	Issuing licenses for use of PEFC trademarks by the Forest Research Institute (IBL) (May 2022)
DAC-18:2021	Accreditation of management system certification bodies in the area of sustainable forest management (December 2021)
(none)	Development report
(none)	System Description
(none)	Documents providing evidence of the revision process, such as: <ul style="list-style-type: none"> • Comments from consultation • Stakeholder information • Identified stakeholders • Bylaws • Sample license agreements • Application letter
(none)	PEFC Checklists for: <ul style="list-style-type: none"> • Standard Setting Procedures and Process • Certification and Accreditation Procedures • Group Forest Management Certification • Scheme Administration • Sustainable Forest Management

Table 2 The PEFC Council Technical documents used

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



	PEFC Council document	Date
12	PEFC Checklist – Standard-setting Procedures and process	30 November 2019
13	PEFC Checklist – Group Forest Management Certification	30 November 2019
14	PEFC Checklist – Sustainable Forest Management	30 November 2019
15	PEFC Checklist – Certification and Accreditation Procedures (Annex 6)	30 November 2019
16	PEFC Secretariat's clarification concerning the content of the assessment report (clarification 30/10/12).	30 October 2012

1.4 Methodology adopted

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

1. Assessment of the Standard-setting Procedures and process

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

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

To assess the standard-setting process, the standard development report, explanations from PEFC Poland, additional evidential records and results of stakeholder consultations are used to evaluate compliance of the standard-setting process. The PEFC Council conducted an international public consultation on the scheme, and a stakeholder survey was organized by Form International through questionnaires that were sent out to members of the Working Groups and other relevant stakeholders identified by PEFC Poland during the standard-setting process.

2. Assessment of the Sustainable Forest Management standard

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

3. Assessment of the Chain of Custody standard

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

4. Assessment of the Group Certification model

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

5. Assessment of the Certification and Accreditation Procedures



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

6. Other aspects regarding functions and efficiency of the scheme

The functions and efficiency of the PFCS were evaluated on the basis of descriptions and information obtained in correspondence with PEFC Poland and stakeholders.

The report is written in line with the guidelines of the PEFC Council, PEFC GD 1007:2017 Appendix 2 for the content of an assessment report.

1.5 Assessment process

The conformity assessment process consisted of the following steps:

1. Public consultation

The international public consultation was held from 27 June to 25 August 2022. No comments were received (Annex 3).

The national stakeholder survey was held from 14 to 27 November 2022. Form International sent out questionnaires to all stakeholders that were members of the Working Group and additional stakeholders that were invited and/or participated in public consultation during the revision process. In total 86 questionnaires were sent out, 12 responses were received. Results of the stakeholder survey (Annex 2) were used in the assessment.

2. Technical desk study

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

3. Elaboration of draft report

The draft report was sent to PEFC Poland and PEFC Council Secretariat on 12 December 2022.

4. Commenting period

Based on the draft report, PEFC Poland will provide responses, additional references, information and clarifications to the draft report.

5. Elaboration of final draft report

Based on the responses and additional references and clarifications to the draft report, a final draft report was developed and sent to PEFC Council Secretariat on 17 February 2023.

6. Internal review of the final draft report

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



7. Final analysis and reporting

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

A timetable of the assessment process is presented below.

Week	1	2	3	4	5	6	7*	8	9	10	11	12	13	14	15
1a. International public consultation	*														
1b. Stakeholder survey															
2. Technical desk study															
3. Elaboration of draft report															
4. Commenting period PEFC Poland															
5. Field visit **															
6. Elaboration of final draft report															
7. Internal review															
8. Elaboration final report															

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

** Not applicable for this assessment

1.6 Report structure

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

Chapter 2	Explicit statement in the form of a recommendation on whether the PEFC Council should maintain the endorsement the PFCS
Chapter 3	Summary of the findings
Chapter 4	Overview of the key structures of the scheme
Chapter 5	Standard-setting Procedures – assessment results
Chapter 6	Standard-setting process – assessment results
Chapter 7	Forest management standard – assessment results
Chapter 8	Group Certification Model – assessment results
Chapter 9	Chain of Custody standard – assessment results
Chapter 10	Certification and accreditation arrangements – assessment results
Chapter 11	Other aspects related to the Scheme
Annex 1	PEFC Checklists



Annex 2	Results of the stakeholder survey
Annex 3	Results of international consultation
Annex 4	Report on the field assessment
Annex 5	Internal review

2. Recommendation

Based on the results of this conformity assessment, Form International recommends the PEFC Council **to maintain the endorsement of the PEFC Poland Certification Scheme**, on the condition that the remaining five (5) nonconformities found in the scheme documentation are corrected within six (6) months after endorsement.

The remaining nonconformities found in the Scheme documentation:

- Four (4) in the Forest Management Standard
- One (1) in the Group Certification Model

The nonconformities are classified as minor. In relation to the standard-setting process, ten (10) nonconformities are found. The nonconformities found in the standard-setting process did not undermine or damage the review process. It would therefore not be adequate to redo the standard-setting process based on the nonconformities found in the process. However, it is recommended that three (3) nonconformities, related to PEFC ST 1001:2017 requirements 5.3.2, 8.2.1 and 8.2.2, are addressed within six (6) months after endorsement.



3. Summary of the findings

The table below presents a summary of the assessment findings. Fifteen (15) nonconformities were found. The following colour coding is applied indicating the level of compliance with PEFC benchmark:

	In compliance with PEFC benchmark
	Not in compliance with PEFC benchmark, only minor nonconformities
	Not in compliance with PEFC benchmark, includes major nonconformities

Assessment scope	Reference documentation	Non-conformities	Assessment conclusion	Compliance with PEFC benchmark
Structure of the system	Scheme documentation	None	The system includes all relevant standards, procedures and arrangements.	Yes
Standard-setting Procedures	PEFC PL 1001:2021	None	Well developed procedures.	Yes
Standard-setting process	Process documentation, including invitations, minutes, websites etc.	10 minors	The nonconformities found in the standard-setting process did not undermine or damage the review process. It would therefore not be adequate to redo the standard-setting process based on the nonconformities found in the process. Additional evidence required for some remaining nonconformities.	No
Forest Management Standard	PEFC PL 1003:2022	4 minors	Well developed standard. Corrective actions required for remaining nonconformities.	No
Group Certification Model	PEFC PL 1004:2022	1 minor	Well developed standard. Corrective action required for remaining nonconformity.	No
Chain of Custody Standard	PEFC ST 2002:2020	None	PEFC ST 2002:2020 is adopted	Yes
Forest Management certification and accreditation arrangements	PEFC PL 1002:2022 DAC-18:2021	None	Scheme documentation includes normative reference to ISO 17021.	Yes
Chain of Custody Certification and Accreditation Procedures	PEFC ST 2003:2020	None	PEFC ST 2003:2020 is adopted	Yes

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

Any nonconformity is further elaborated and justified in the chapter covering the respective standard or procedure.

4. Structure of the scheme

4.1 Introduction to the forestry sector in Poland¹

In 2020 Poland had a forest cover of 29.6%, or 9.26 million hectares, including one of the remaining areas of primary forest in Europe. The Polish Forest cover has increased steadily over the last decades and afforestation efforts aims to increase the forest cover up to 33% by 2050. The forest cover is lowest in the centre of Poland and highest in most of the Western, Northern and Southern provinces (figure 1).



Figure 1: Forest Cover in Poland per province (CSO Poland; derived from PEFC Poland System Description)

The forests are rich in flora and fauna and are home to an estimated 65% of Polish species. Over 55% of forests are coniferous forests, while the remainder is made up of broad-leaved forests (about 40%), and alder and riparian forests (3%). The most common broad-leaved tree species include: oak, ash, maple, sycamore, elm, as well as birch, beech, alder, poplar, hornbeam, aspen, linden and willow.

The Polish forests are mainly (81.2 %) publicly owned. This includes forest areas under the National Forest Holding (77,3%), National Parks (2%), forests under management of the Agricultural Agency of the State Treasure (0.4%), and municipal and urban forests (0.7%). The ownership structure of forests in the post-war period remained almost unchanged. Small changes in forest ownership in post-war period result from afforestation initiatives. Another 18.8% of Polish forests are privately owned by an estimated 1.2 million forest owners. Privately owned forest areas are therefore highly fragmented and average size of such forest is 1.2 ha.

¹ The information from this paragraph is mostly derived from the “Scheme Description – The Polish PEFC Scheme” and information presented on the PEFC website www.pefc.org.



The State Forests National Forest Holding (in short: State Forests) is an organization protecting, utilizing, and shaping Poland's forests for over eighty years. It manages publicly owned forests on behalf of the Polish State Treasury, an area over 7.5 million hectares. State Forests operates on the principle of financial independence and is managed by the Director General of the National Forests. It consists of 17 regional directorates and 430 forest districts (figures from 31 December 2021). Forests are managed based on the regulations found in the Polish constitution, the Act on Forests, The Polish Forest Policy, as well as other national and international regulations.

Since the endorsement of the Polish PEFC Scheme in 2008, over 7 million hectares of Polish forests have been PEFC certified. Almost all these Polish forests are publicly owned forests (as part of the State Forests National Holding) certified under a regional group certificate. Each province has its own group. In addition to these certified groups, only one poplar plantation and one university forest is certified.²

4.2 Organisation of the Scheme

The Forest Research Institute of Poland, being a member of the PEFC Council, set up the PEFC Polska Council, bringing together organisations associated with forestry, wood processing, environmental protection, as well as forest managers and owners. PEFC Poland was established in December 2003 by the State Forests at the Main Board of the Association of Foresters and Wood Technologists (SITLiD), with the aim of promoting sustainable development in the forestry sector. The first Polish PEFC scheme was endorsed in 2008, and the system was re-endorsed in 2015.

The organization of the Polish PEFC Scheme is described in the Scheme description document of PEFC Polska: "The PEFC Poland is an initiatory, opinion-giving and advisory body with regard to management of the Polish forest certification scheme within the framework of the PEFC. The PEFC Poland Council is a decision-making body with regard to definition and review of criteria and indicators of sustainable forest management and supply chain certification. With regard to definition of criteria and indicators of sustainable forest management and supply chain certification, the PEFC Polska Council is standalone and independent of its members and third parties.

The PEFC Poland Council may include organisations dealing with broadly understood forestry, woodworking or environmental protection, as well as forest managers and owners. Membership in the PEFC Polska Council is voluntary. Members of the Council receive no compensation for their involvement in the Council. The PEFC Poland Council's governing bodies are:

- General Meeting of members, divided into three chambers: forest management, woodworking and non-wood material processing industry and socio-scientific chambers.
- Board of Directors.

² Derived from: "The Polish PEFC Scheme – System description"



The PEFC Poland Council accomplishes its objectives and performs its tasks in accordance with these Bylaws and relevant provisions of the PEFC as an international organisation. The PEFC Poland Council's tasks are as follows:

- Review on a regular basis the Polish forest certification system operating in accordance with the legal system of the Republic of Poland and the rules laid down by the PEFC Council based in Geneva;
- Review on a regular basis criteria and indicators of sustainable forest management;
- Approve training programmes for certification bodies and make sure these are implemented to a suitable level;
- Co-operate with the Polish Centre for Accreditation (PCA) in evaluating competencies of certification bodies operating in the area of the Polish forest certification system;
- Promote the PEFC forest certification system;
- Provide certification bodies with binding interpretations of indicators and criteria of sustainable forest management;
- Co-operate with other members of the PEFC Council and similar Polish and international organisations.³

Depending the need to address various tasks and issues, the Council sets up standing or ad hoc Working Groups.

4.3 The PFCS

PEFC Poland developed several Procedural and Standard documents that are schematically presented in the figure below. No country specific standards for Chain of Custody and for PEFC Logo usage rules are developed, instead, the PEFC procedures PEFC ST 2002 and PEFC ST 2001 are used.

The scheme currently contains procedures, standard for sustainable forest management and a chain of custody standard. The PFCS provides for independent assessment of forest management practices and audit of timber product manufacturers or exporters to ensure that timber products manufactured or exported are sourced from sustainably managed forests and meet the criteria for certified timber products.

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

Standards for operators	Standards for certifying bodies	Scheme governance
PEFC PL 1003:2022 Sustainable forest management – Requirements PEFC PL 1004:2022	PEFC PL 1002:2022 Certification and accreditation procedures	System Description of the Polish PEFC Scheme PEFC PL 1001:2021

³ Derived from: "The Polish PEFC Scheme – System description"



Standards for operators	Standards for certifying bodies	Scheme governance
<p>Group forest management certification – Requirements</p> <p>PEFC ST 2002:2020</p> <p>Chain of Custody of Forest and Tree Based Products – Requirements</p> <p>PEFC ST 2001:2020</p> <p>PEFC Trademarks Rules – Requirements</p>	<p>PEFC ST 2003:2020</p> <p>Requirements for Certification Bodies operating Certification against the PEFC International Chain of Custody Standard</p> <p>PEFC PL 3001:2022 PEFC</p> <p>Notification of Certification Bodies operating Forest Management System and/or Chain of Custody Certification in Poland</p> <p>DAC-18:2021</p> <p>Accreditation of management system certification bodies in the area of sustainable forest management. Polish Accreditation Centre</p>	<p>Standard setting – Requirements (developed based on PEFC ST 1001:2017)</p> <p>PEFC PL 3002:2022</p> <p>Issuing licenses for use of PEFC trademarks by the Forest Research Institute (IBL)</p>

5. Standard-setting Procedures

This chapter presents the findings of the assessment of the Standard-setting Procedures. The PEFC Checklist related to the Standard-setting Procedures can be found in Annex 1 part I, which presents all the assessment results including references and quotations to system documentation.

5.1 Analysis

The procedures for standard-setting are regulated in PEFC EN 1001 Standard-setting procedures. The document is clearly structured and contain elaborate requirements for standard-setting processes. It is noted that PEFC ST 1001:2017 is included as normative reference, but since the Scheme developed its own standard setting procedures, the requirements are expected to be met within the Scheme specific procedures.

The procedures are quite well developed and clearly structured. The following observations⁴ are made:

- The use of the English language is sometimes poor and in cases results in vague wordings, such as in clause 5.6 (“preliminary version”, which is assumed to be the enquiry draft, or “draft version” as in the first sentence of clause 5.6);
- Clause 5.7 requires that the final version of the standard, developed through consensus by the Working Group, shall be formally approved as a standard by the PEFC Poland Council “by voting”. It is remarkable that the procedures still require a voting by members of the PEFC Poland Council, even when consensus is reached in the working group. Technically this means that the PEFC Poland Council could overrule consensus reached by stakeholders;
- The structure of the document is sometimes not completely logical and clauses that relate to the same topic are not always under the same heading. For example clause 5.6 called “public consultation”, is about the public consultation period for the enquiry draft. However, it also contains the clause the PEFC Poland shall review the standard-setting process based on feedback received in response to the public announcement, which instead would be expected to be placed after clause 5.2.10.

5.2 Nonconformities

The procedures comply with the PEFC requirements, no non-conformities are found.

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



6. Standard-setting process

This chapter presents the findings of the assessment of the standard-setting process. The PEFC Checklist related to the standard-setting process can be found in Annex 1 part I, which presents all the assessment results including references and quotations to system documentation.

6.1 Analysis

The standard revision process was started in December 2019. A working group was installed in June 2021, which held meetings from July 2021 to November 2021 to prepare a preliminary draft for public consultation. The public consultation was held from November 2021 till January 2022 after which received comments and remarks were processed a final draft was prepared. Consensus was reached in April 2022, and the final versions were formally adopted by the PEFC Poland Council in May 2022.

The following observations⁵ are made:

- Clause 6.5.1a: announcing the public consultation on a website is a relatively passive approach, as it cannot be assumed that all stakeholders will regularly check the website. Also an E-mail was sent, which however dated from 20 December 2021, after which only 40 days remained for responding;
- In general the evidential material is limited, where often just the minimum is available. In several cases this was insufficient and a nonconformity was raised. The Assessor got the intention that standard-revision procedures were not always on top of mind during the process, which caused limited evidential references and omission of certain elements.

6.2 Nonconformities

There are ten (10) nonconformities found, all classified as minor. The nonconformities found in the standard-setting process did not undermine or damage the review process. It would therefore not be adequate to redo the standard-setting process based on the nonconformities found in the process. For some nonconformities however (e.g. on feedback mechanism), corrective actions are still required.

The nonconformities found in the standard-setting process are presented in the table below. Some of them can be addressed by providing additional evidence.

In the table, the following formatting is applied in the “reference” column:

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

⁵ Observations are weaknesses found in the Scheme, which are not considered to be a nonconformity.



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
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: (d) Stakeholders involved in standard-setting activities including participants in each working group meeting,	NO	<i>Attendance lists of working group meetings were not found.</i>
5.3.2 The standardising body shall establish at least one contact point for enquiries, complaints and appeals relating to its standard-setting activities. The contact point shall be easy to access and readily available.	NO	<i>While a general address and email address can be found on the PEFC Poland website, no reference is found on the website that for enquiries, complaints and appeals these addresses (or a specific contact point for enquiries, complaints and appeals) shall be used.</i>
6.1.2 For the revision of a standard the proposal shall cover at least (a) and (e) of clause 6.1.1. 6.1.1 (a) the scope of the standard (e) a description of the stages of standard development and their expected timetable.	NO	<p>Public announcement 11 May 2021 found on PEFC Poland website (translated with Google translate)</p> <p>"Last year, the PEFC Polska Council, at the General Meeting, started the process of amending the national PEFC system. (...) The main reasons for the current revision of Polish PEFC standards are:</p> <ul style="list-style-type: none"> - adaptation to the requirements of PEFC Int. - in 2018, the amendment of the meta-standard PEFC ST 103:2018 Sustainable Forest Management - Requirements was completed; - adaptation to the requirements and practices applied in Poland; - improving the transparency and clarity of documents to facilitate their practical use. <p>One of the basic assumptions of recognizing criteria and certification in the PEFC system is to ensure participation in their creation by all legal and natural persons interested in forestry, nature conservation and sustainable development. Therefore, we invite you to take an active part in the planned works. Within the next month (until June 11) we are waiting for nominations of people who will be your representatives in working groups (application form). (...) The amendment work will be carried out in accordance with the principles described in the PEFC PL 1001:2021 Standard Procedures standard."</p> <p>Explanation provided by PEFC Poland</p>

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>“At the General Meetings of the PEFC Poland Council we often spoke about the next steps in the process of amending the standard. The inclusion of a standard (in announcement) describing these stages seemed sufficient to us.</p> <p>As for timetable - we were operating in a pandemic situation on the one hand, on the other hand we had experience from the previous revision, during which we received a lot of comments and remarks to be discussed within the working group.”</p> <p><i>The announcement includes a description of the first stage of the standard revision process, and reference is made to the standard-setting procedures, which includes all stages. However, an expected timetable is not found.</i></p>
6.2.1 The standardising body shall identify stakeholders relevant to the objectives and scope of the standard-setting activities by means of a stakeholder identification mapping exercise. It shall define which stakeholder groups are relevant to the subject matter and why. For each stakeholder group the standardising body shall identify the likely key issues, key stakeholders, and which means of communication would be best to reach them.	NO	<p>Explanation provided by PEFC Poland</p> <p>“Key stakeholders and key issues were identified at the previous revision. Later, with the current revision, the list was updated. (...) As for the communication itself, the 3G network covers almost the entire area of Poland and access to websites and e-mail is not hindered in any way. In terms of mobile internet access, Poland was in the highest position. The penetration of the service in July 2020 in our country was (...) higher than the EU average”</p> <p><i>A stakeholder identification document was found, which includes a list of stakeholders, their addresses, key expertise and gender. However, no document is found providing background to the stakeholder identification, including 1) defining which stakeholder groups are relevant to the subject matter and why, 2) likely key issues, 3) identification of key stakeholders, and 4) which means of communication would be best to reach them.</i></p>
6.4.1 The standardising body shall establish a permanent or temporary working group or adjust the composition of an already existing working group based on nominations it received. Acceptance and refusal of nominations shall be justified in relation to the requirements for balanced representation of the working group, considerations of an appropriate gender balance, relevance of the organisation, an individual's competence, an individual's	NO	<p><i>No evidence was found on how acceptance and refusal of nominations for the working group was based on gender balance, relevance of the organisation, an individual's competence, an individual's relevant experience and resources available for standard-setting.</i></p>

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
relevant experience and resources available for standard-setting.		
6.5.1 The standardising body shall organise public consultation on the enquiry draft and shall ensure that: g) a synopsis of feedback is compiled for each material issue, including the outcome of considering the issue. ⁶ The synopsis is made publicly available (e.g. on a website) and is sent to each stakeholder/party that gave feedback.	NO	<i>A synopsis was found of feedback received from stakeholders during the public consultation period. The list of comments received, together with the decisions of the working group, was posted on the PEFC Poland website. However, it was not sent to each stakeholder that gave feedback.</i>
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.	NO	Explanation provided by PEFC Poland "PEFC Int at the 2019 General Assembly reported that for several national schemes the review should start by the end of 2019. Hence, such a review has been initiated in Poland and formally announced at the General Assembly of PEFC Poland in December 2019. The review collected just over 200 comments. A list of these is given in the file: Summary of comments made in the review. Their discussion was devoted to the first four meetings of the working group." <i>The review date of the SFM standard was on 14 November 2019. The current revision process started with a decision of PEFC Poland on 19 December 2019, which is a month later than the review date. It shall be noted that no official review process was conducted, a normal revision was aimed for.</i> <i>Next, no evidence was found that the review of the standard was based on a gap analysis.</i>
8.2.1 The standardising body shall establish and maintain a permanent mechanism for collecting and recording feedback on a standard. This mechanism shall be accessible on the website of the standardising body and/or PEFC National Governing Body with clear	NO	<i>No evidence was found that PEFC Poland has established a permanent mechanism for collecting and recording feedback on a standard, which is expected to be available on their website.</i>

⁶ 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.

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
directions for providing feedback. ⁷		
8.2.2 All feedback received through all channels, including meetings, training courses, etc. shall be recorded and considered.	NO	<i>No evidence was provided on how PEFC Poland will record and consider all feedback received through all channels.</i>
8.3.1 At the start of a review, the standardising body shall evaluate the standard against appropriate PEFC International standards, national laws and regulations, and other relevant standards to identify potential gaps in the standard.	NO	<p>Development Report</p> <p>"1. Introduction</p> <p>(...) The start of the second revision was formally announced at the General Assembly of PEFC Poland in December 2019. There were two reasons for this decision:</p> <ul style="list-style-type: none"> - the publication of updated versions of the PEFC ST 1001, PEFC 1002 and PEFC 1003 standards by the PEFC Council and therefore the need to adapt the national standards; - the need for cyclic review/updating of the Polish system. <p>In addition in February 2020 PEFC Council published three revised standards related to chain of custody certification - PEFC ST 2001, PEFC St 2002 and PEFC 2003 - which in turn necessitated the update of procedures used by PEFC Poland: notification and licensing of PEFC trademarks. This meant in practice that all PEFC system documents in Poland needed to be revised."</p> <p><i>Although a general conclusion was drawn that the standards had to be revised, no gap analysis was found, which would have identified potential gaps in the standard.</i></p>

⁷ NOTE Feedback can be sent in various formats: comments, requests for clarification and/or interpretation, complaints, etc.



7. Forest Management Standard

This chapter presents the findings of the assessment of the Forest Management Standard. The PEFC Checklist related to the Forest Management Standard can be found in Annex 1 part III, which presents all the assessment results including references and quotations to system documentation.

7.1 Analysis

The Forest Management Standard is found in PEFC PL 1003 Sustainable forest management – requirements and largely follows the PEFC benchmark standards. It contains the following sections:

1. Introduction
2. Basic documents (which includes a long list of applicable legislation)
3. Scope, terms and definitions
4. Criteria for sustainable forest management
 - 4.1. Criterion 1: Maintenance or enhancement of forest resources and their contribution to the global carbon cycle
 - 4.2. Criterion 2: Maintenance of the health and vitality of the forest ecosystem
 - 4.3. Criterion 3: Preserving and enhancing the productive functions of forests (wood and non-wood products)
 - 4.4. Criterion 4: Preservation, protection and enhancement of biodiversity of forest ecosystems
 - 4.5. Criterion 5: preservation and enhancement of the protective functions of forest management (in particular soil and water protection)
 - 4.6. Criterion 6: Preservation of other socio-economic functions and conditions
 - 4.7. Criterion 7: Compliance with legal requirements

In addition, the standard includes two Annexes: guidelines for interpretation of criteria for plantations (Annex 1) and requirements for logging and skidding (Annex 2). Annex 1 largely follows the interpretation wording of the PEFC benchmark standard.

PEFC PL 1003 applies to “all forms of forest ownership in the certification process by an independent certification body under the PEFC scheme and include defined certification criteria for both individual forest areas and the regional level” and requirements apply “to all forest management tasks performed on areas submitted for certification”. The standard furthermore explains “there is no minimum level or limitation set in this document for determining compliance of forest management with the criteria for sustainable forest management. Determination of such compliance is within the competence of the certification body after consideration of comments of the certified entity, in matters requiring additional clarification after taking into account the interpretation of PEFC Poland.” Requirements are complemented with additional indicators marked with letters A, B, C, etc. They “are a possibility to specify forest management objectives within a specific area under assessment, based on knowledge of experts (certification bodies and certified bodies)”. They are therefore not considered mandatory, but provide options for indicators to be used by auditors, and in that sense (partially) provides further interpretation of the



requirement, which is a strength of the Scheme. However, it also has a weakness: the indicator lists are generally not complete in the sense that they often do not fully cover the requirement and therefore might unintentionally give the impression that the listed indicators should be sufficient (whereas they are not). Since it is specified in chapter 3 that these indicators are a possibility, it is concluded to be a weakness rather than a non-conformity. As they are not normative, they are not included as evidence for conformity in this assessment.

The definition of forest is based on the definition of forest in Article 3 of the Forest Act of 28 September 1991, and is defined as “land with a compact area of at least 0.10 ha, covered with forest vegetation (forest crops) - trees and bushes and undergrowth - or temporarily deprived of it, as well as land related to forest management”. In addition, plantation is defined as “area on which seedlings or seeds of fast-growing introduced or indigenous species have been planted, established for the purpose of producing as much timber or non-timber goods and services as possible within a shorter time cycle than in forest management.” Conversion of forest is then defined as “human conversion of forest to another land use or plantation”. It shall be noted that conversion of ecologically important non-forest areas is not allowed at all.

With regards to plantations the cut-off date is set to 31 December 2010, and special attention is required with regards to nutrient decline, which shall be an important part of the planning and management stage of the production cycle.

The requirements in many cases follow the structure and wording of the PEFC benchmark standard, without much deviation or expanding requirements. The standard is quite well developed and clearly structured. It does not contain any requirements related to Trees outside Forests (TOF). The following observations⁸ are made:

- In relation to the conversion requirements, PEFC Poland does not further define the wording “high forest carbon stocks”, it therefore remains up to the interpretation of auditors how to assess this component;
- The use of the English language is sometimes poor and in cases results in vague wordings, such as in clause 4.2.7 (“the use of care, use and transport techniques”, which is assumed to mean the application of maintenance, harvesting and transport techniques) and clause 4.4.13 (“highly frequented areas”, which is assumed to mean “frequently visited areas”);
- The note in clause 4.4.7 on the use of genetically modified trees describes the future conditions under which genetically modified trees might be introduced, which might be misinterpreted by companies to already use these trees when they themselves argue to have sufficient scientific proof. However, since 4.7 clearly prohibits the use, and the note also includes a description of the ban, this is not considered a nonconformity.

7.2 Nonconformities

There are four (4) non-conformities found, all classified as minor. They are presented in the table below and can be addressed by providing additional evidence and/or adjusting the standard.

⁸ Observations are weaknesses found in the Scheme, which are not considered to be a nonconformity.



In the table, the following formatting is applied in the “reference” column:

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

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
7.5.1 The standard requires that the organisation’s management system shall include documented information required by the standard and determined by the organisation as being necessary for the effectiveness of the sustainable forest management system.	NO	<p>PEFC PL 1003ver2EN:2023</p> <p>“3.15 Management plan (with particular reference to the forest management plan or its equivalent)</p> <p>Documented information setting out the objectives, activities and control arrangements for the management of resources and ecosystem services over an agreed period of time.</p> <p>4.1.3. (...) Forest management plans (or their equivalents) shall be developed and, where necessary, updated according to national legal requirements and taking into account available scientific research results.</p> <p>4.1.4. Forest management plans (or their equivalents) shall include at least: a description of the state of the forest at the date of the plan, long-term and mid-term objectives, allowable harvest and/or management areas for the duration of the plan.”</p> <p><i>The reference only refers to the forest management plan. It is insufficiently ensured that the organisation’s management shall include (all) documented information required by the standard and determined by the organisation as being necessary for the effectiveness of the sustainable forest management system (e.g. standard operating procedures).</i></p>
7.5.2 The standard requires that the documented information is relevant, and updated as appropriate, to the activities of the organisation.	NO	<p>PEFC PL 1003ver2EN:2023</p> <p>“4.1.3. (...) Forest management plans (or their equivalents) shall be developed and, where necessary, updated according to national legal requirements and taking into account available scientific research results.”</p> <p><i>The reference only refers to the management plan. It is insufficiently ensured that the requirement also applies to other documented information (which shall be relevant, and updated as appropriate, to activities of the organisation).</i></p>
8.1.4 The standard requires that forest conversion shall not occur unless in justified circumstances where the conversion: a) is in compliance with national and regional policy and legislation applicable for land use and forest	NO	<p>PEFC PL 1003ver2EN:2023</p> <p>“3.8 Forest</p> <p>Forest is land with a compact area of at least 0.10 ha, covered with forest vegetation (forest crops) - trees and bushes and undergrowth - or temporarily deprived of it, as well as land related to forest management.</p> <p>Note: The definition is based on the definition of forest in Article 3 of the Forest Act of 28 September 1991.</p>

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
management and is a result of national or regional land-use planning governed by a governmental or other official authority including consultation with affected stakeholders; and		<p>3.9 Conversion of forest</p> <p>Human conversion of forest to another land use or plantation</p> <p>3.10 Plantation</p> <p>Area on which seedlings or seeds of fast-growing introduced or indigenous species have been planted, established for the purpose of producing as much timber or non-timber goods and services as possible within a shorter time cycle than in forest management</p> <p>4.1.10. Conversion of forests into other land use categories shall not take place unless there are reasonable circumstances in which conversion:</p> <p>is consistent with national or regional policies and laws on land use and forest management, and is the result of a national or regional land use plan developed by the government or other authorities, taking into account consultations with stakeholders affected by the standard (persons and organizations involved materially or directly) (...)</p> <p>A. Forest land area converted to other land use categories at the end of the year preceding the audit and each 3 years back (ha).</p> <p>Annex 1: Guidelines for interpretation of criteria for plantations (...)</p> <p>The requirement on "Conversion of forests to other land uses" means that plantations created by conversion after 31 December 2010 in circumstances other than "justified" do not meet this requirement and cannot be certified."</p> <p><i>Clause 4.1.10 only refers to conversion of forests to other land use-categories. However, based on the definition of "conversion of forest" in clause 3.9, it is concluded that clause 4.1.10 is also applicable to conversion of forest to plantation. As this is not specifically mentioned, it could be easily misinterpreted by standard users. Next, although the indicators (listed as A., B., C. etc.) are not mandatory and provide options for indicators to be used by auditors, indicator A. of clause 4.1.10 does not meet the benchmark standard, as this should also consider converted areas back to 31 December 2010 and restrict to the previous 3 years.</i></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.	NO	<p>PEFC PL 1003ver2EN:2023</p> <p>"4.6.9. FMU shall provide for education, communication and consultation with local communities and other stakeholders on sustainable forest management. Mechanisms shall be in place to respond to complaints and to resolve forest management related disputes between forest managers and the local population."</p> <p>Explanation provided by PEFC Poland</p> <p>"Forest management is based on economic principles. New employees are hired when the need arises. The potential number of places increases seasonally, when workers are needed for forest nurseries and silviculture."</p> <p><i>It is insufficiently ensured that management shall give consideration to new opportunities for employment of local people. Although this</i></p>

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<i>might go well in practice, it is insufficiently ensured in the requirements of the standard.</i>

8. Group Certification Model

This chapter presents the findings of the assessment of the Group Certification Model. The PEFC Checklist related to the Group Certification Model can be found in Annex 1 part II, which presents all the assessment results including references and quotations to system documentation.

8.1 Analysis

The Group Certification Model is found in PEFC PL 1004:2022 Group forest certification - Requirements. The Group Certification Model allows for multiple forest owners/managers to be certified under a single certificate. In practice, the Group Certification Model is applied for state forests, where each province considers one group organisation. Most private forests are fragmented and small, and until these small forests are not organised in groups nor certified. However, for assessment it is assumed these could eventually establish groups to obtain forest certification.

The requirements are well developed and clearly structured, and largely reflect the structure and wording of the PEFC benchmark requirements. Little country specific interpretations are developed, nor additional requirements or further detailing of requirements.

8.2 Nonconformities

There is one (1) non-conformity found, classified as minor, and presented in the table below. It can be addressed by adjusting the standard.

In the table, the following formatting is applied in the “reference” column:

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

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
4.3.3 The standard shall define which requirements of the sustainable forest management standard may be fulfilled on group level.	NO	<p>PEFC EN 1004ver2:2023</p> <p>“4.2.1. The group entity shall provide a commitment to:</p> <p>a) adherence to the standard of sustainable forest management and other applicable requirements of the certification scheme.</p> <p>4.3. Role and responsibilities of the group entity</p> <p>c) Commitment on behalf of the entire group organisation to comply with the requirements of the Sustainable Forest Management Standard and other relevant requirements of the Polish PEFC forest certification scheme.</p> <p>d) shall define which requirements of the sustainable forest management standard may be fulfilled on group level.”</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<i>Clause 4.3 d does define that the group entity shall define which requirements may be fulfilled on group level. This is not in line with the PEFC benchmark. It shall be noted this shall be defined in the standard.</i>



9. Chain of Custody Standard

The Scheme Description document provides further explanation on systems documentation. Section 7.2 notifies that “Chain of custody certification is carried out according to international normative PEFC ST 2002:2020 Chain of Custody of Forest and Tree Based Products – Requirements.”

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



10. Certification and accreditation arrangements

This chapter presents the findings of the assessment of the certification and accreditation arrangements. The PEFC Checklist related to the certification and accreditation arrangements can be found in Annex 1 part IV, which presents all the assessment results including references and quotations to system documentation.

10.1 Analysis

The requirements for accreditation and certification are (mostly) regulated in PEFC PL 1002:2022 (Certification and accreditation procedures), and (partially) in the document named DAC-18:2021 (Accreditation of Management System Certification Bodies in the Area of Sustainable Forest management). PEFC PL 1002:2022 is a clearly structured document. The Scheme Description document lists in section 3 normative references and in section 5.2 adopted international normative documents. In both sections PEFC ST 2003:2020 Requirements for Certification Bodies operating Certification against the PEFC International Chain of Custody Standard is listed. This sufficiently ensures that the requirements of PEFC ST 2003:2020 are met by the PFCS.

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

- PN-EN ISO/IEC 17000:2020 (Conformity assessment - Terminology and general principles)
- PN-EN ISO/IEC 17011:2018 (Conformity assessment - Requirements for accreditation bodies accrediting conformity assessment bodies)
- ISO/IEC 17021-1:2015 (Requirements for certification bodies providing forest management certification)
- PN-EN ISO 19011:2018 (Guidelines for auditing management systems)
- PN-EN ISO/IEC 17065:2013 (Conformity assessment - Requirements for bodies providing certification of products, processes and services)

10.2 Nonconformities

The procedures comply with the PEFC requirements, no non-conformities are found.

11. Other aspects

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

- **Notification of Certification Procedures**

These procedures are elaborated in PEFC PL 3001:2022 PEFC Notification of Certification Bodies operating Forest Management System and/or Chain of Custody Certification in Poland;

- **PEFC Logo Usage Licensing**

These procedures are elaborated in PEFC ST 2001:2020 PEFC Trademarks Rules – Requirements, which is adopted by the PFCS;

- **Complaints and Dispute Resolution Procedures**

These procedures are elaborated in sections 10.2 and 10.3 of PEFC PL 1002:2022 Certification and accreditation procedures.

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



Annex 1 PEFC Checklists

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

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

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

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

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
Standardising Body			
5.1.1 The standardising body shall have written procedures for standard-setting activities describing:			
(a) its legal status and organisational structure, including a body responsible for consensus-building (working group, refer to 6.4) and procedures for formal adoption of the standard (refer to 7.1),	Procedures	YES	<p>PEFC PL 1001:2021</p> <p>“5.1.1 The standard-setting body for the PEFC forest management certification in Poland is the PEFC Poland. The structure and functioning of the PEFC Poland Council is defined in the Rules of Procedure.</p> <p>5.7.1 The final version of the document, developed through consensus by the Working Group, shall be formally approved as a standard by the PEFC Poland Council by voting. The formally approved standard shall be published on the PEFC Poland website within 14 days of approval.”</p> <p>Bylaws of PEFC Polska Council</p> <p>§ 1 - 1. The PEFC Polska Council, hereinafter referred to as the Council, shall be an initiatory, opinion-giving and advisory body with regard to management of the Polish forest certification scheme within the framework of the PEFC. The PEFC Polska Council shall be a decision-making body with regard to definition and review of criteria and indicators of sustainable forest management and supply chain certification.</p>



PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>2. The Council shall have no legal personality, and consequently may not acquire rights, incur obligations or own property.</p> <p>§ 6 - 1. The Council's governing bodies shall be:</p> <p>1.1. General Meeting of members, divided into three chambers: forest management, woodworking and non-wood material processing industry and socio-scientific chambers.</p> <p>1.2. Board of Directors.</p> <p>§ 9 - 1. The Council shall set up standing or ad hoc Working Groups, depending on the need to address various tasks and issues.</p>
(b) procedures for keeping documented information,	Procedures	YES	<p>PEFC PL 1001:2021</p> <p>“5.1.10 The PEFC Poland Office shall keep records related to the standard setting process. All documents and data shall be kept for at least five years. Documents shall be stored electronically (scans, archived email files, etc.) and/or in paper form if paper documents were used. All records shall be available to interested parties upon request in a form which is accessible to them.</p> <p>6.1 In order to ensure transparency and public availability, all adopted drafts and documents approved by the PEFC Poland Board shall be published on the PEFC Poland website within four weeks of formal approval. The same applies to the report on the amendment process, in particular including information on the handling of comments on complaints and appeals.</p> <p>6.2 For the PEFC Council International approval process, the following documents shall be collected and retained for at least five years:</p> <p>a) Description of the amendment process.</p> <p>b) Public announcements, e.g. about the start of an amendment process, a seminar or a consultation period.</p> <p>c) Minutes of PEFC Poland Council meetings.</p> <p>d) Minutes of working group meetings.</p> <p>e) Evidence of consensus, e.g. summary of controversial issues and their resolution</p> <p>f) Documentation of comments, complaints and grievances received.</p> <p>g) Proposal for transition periods for the implementation of new standards and procedures.”</p>
(c) procedures for balanced	Procedures	YES	<p>PEFC PL 1001:2021</p> <p>“5.2.11 The PEFC Poland Office 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</p>



PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
representation of stakeholders,			<p>are relevant to the subject matter and why. For each stakeholder group the PEFC Poland Office shall identify the likely key issues, key stakeholders, and which means of communication would be best to reach them.</p> <p>The PEFC Poland Office shall also identify disadvantaged stakeholders associated with the objectives and scope of the standard setting work, who will be invited to submit a representative to the working group developing the draft standard.”</p> <p>5.2.12 The identification of stakeholders shall be based on the nine main stakeholder groups identified in the Agenda 21 action programme at the United Nations Conference on Environment and Development (UNCED) in Rio de Janeiro in 1992. The stakeholder mapping shall therefore include at least the following groups:</p> <ul style="list-style-type: none"> -forest owners and managers, -business and industry, -forestry entrepreneurs, -NGOs, -scientific and technological communities, -workers and trade unions. <p>5.3.4 The working group shall:</p> <p>b) have balanced representation and participation in decision-making by all categories of stakeholders related to the subject matter and the geographical scope of the standard, while taking into account balanced gender participation, so that one stakeholder does not dominate the whole process or be dominated in the process”</p>
(d) the standard-setting process,	Procedures	YES	<i>PEFC PL 1001:2021 describes the procedures for standard-setting, with main aspects of the process described in chapters 5.2 to 5.7.</i>
(e) the mechanism for reaching consensus, and	Procedures	YES	<p>PEFC PL 1001:2021</p> <p>“5.5.3 Decisions of the working group during the drafting, public comments and comments on the draft version, as well as the decision to recommend the final version for final approval shall be made by consensus. To determine whether there is an objection, the Working Group may use one of the following methods:</p> <ul style="list-style-type: none"> a) a face-to-face meeting with an oral yes/no vote; a vote by a show of hands for yes/no; a statement by the Chair that a consensus has been reached without a vote against (or without an objection expressed by a show of hands); b) a face-to-face meeting with a secret yes/no vote; c) teleconference with oral vote yes/no; d) teleconference with secret ballot yes/no (via web-based application);



PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>e) an emailed request to the working group to agree or disagree when members submit a formal written response (vote), or</p> <p>f) a combination of the above methods.</p> <p>5.5.4 Decisions of the Working Group will be adopted by a qualified majority with at least 2/3 of all members in favour and no more than ¼ of votes against. However, a majority vote cannot override sustained opposition in order to achieve consensus.</p> <p>5.5.5 In the event of a negative outcome that represents a continuing objection to an important part of one of the relevant issues, the situation shall be resolved by the following mechanisms (or one of them):</p> <p>a) discussion and negotiation on a controversial point within the working group in order to find a compromise,</p> <p>b) direct negotiations between objecting and opposing stakeholders to find a compromise,</p> <p>c) additional round(s) of public consultation (if necessary) where further stakeholder input can help to achieve consensus on unresolved issues. The PEFC Poland determines the scope and duration of any additional public consultation.</p> <p>5.5.6 When a substantial issue cannot be resolved and sustained opposition persists, the PEFC Poland shall initiate dispute resolution process (e.g. arbitration)."</p>
(f) review and revision of standard(s)/normative document(s).	Procedures	YES	<p><i>PEFC PL 1001:2021 describes the procedures for the review and revision of standard(s)/normative documents, with main aspects of the process described in chapters 5.2 to 5.7.</i></p>
5.1.2 The standardising body shall make its standard-setting procedures publicly available and shall review its standard-setting procedures regularly. The review shall consider feedback from stakeholders.	Procedures	YES	<p>PEFC PL 1001:2021</p> <p>"5.1.5 Revision of standard-setting procedures in PEFC system shall be carried out by PEFC Poland Office on the basis of remarks submitted by the Board of PEFC Poland. Periodic revision of standard-setting procedures shall be carried out every five years. The revision process of the standard-setting procedures shall start before the end of the five year period. The review shall consider feedback from stakeholders.</p> <p>5.1.11 All relevant information on the standard-setting process shall be publicly available through the media, for example, websites, emails or newspapers.</p> <p>5.5.5 f) reference to publicly available standard setting procedures (on PEFC Poland website).</p> <p>6.1 In order to ensure transparency and public availability, all adopted drafts and documents approved by the PEFC Poland Board shall be published on the PEFC Poland website within four weeks of formal approval."</p>



PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
	Process	YES	<p>The standard-setting procedures are available on the website of PEFC Poland (https://pefc.pl/normy/normy), which was initially approved in 2012, and modified in 2021.</p> <p>Explanation provided by EFC Poland</p> <p>“The PEFC Poland Council is made up of more than 40 stakeholders, representing their organisations. We received comments from three organisations:</p> <ul style="list-style-type: none"> - Forest Women's Association; - State Forests - Polish Forestry Association.” <p><i>Comments on the standard-setting procedures were found.</i></p>
5.2.1 The standardising body shall keep documented information relevant to the standard-setting and review process. Evidence of compliance with the requirements of this standard and the standardising body's own procedures includes:			
(a) Standard-setting procedures,	Procedures	YES	<p>PEFC PL 1001:2021</p> <p>“5.1.10 The PEFC Poland Office shall keep records related to the standard setting process. All documents and data shall be kept for at least five years. Documents shall be stored electronically (scans, archived email files, etc.) and/or in paper form if paper documents were used. All records shall be available to interested parties upon request in a form which is accessible to them.</p> <p>6.1 In order to ensure transparency and public availability, all adopted drafts and documents approved by the PEFC Poland Board shall be published on the PEFC Poland website within four weeks of formal approval.”</p>
	Process	YES	<p><i>PEFC PL 1001:2021 was found.</i></p>
(b) Stakeholder identification mapping,	Procedures	YES	<p>PEFC PL 1001:2021</p> <p>“5.1.10 The PEFC Poland Office shall keep records related to the standard setting process. All documents and data shall be kept for at least five years. (...) All records shall be available to interested parties upon request.</p> <p>5.2.11 The PEFC Poland Office shall identify stakeholders relevant to the objectives and scope of the standard-setting activities by means of a stakeholder identification mapping exercise. It shall define which stakeholder groups are relevant to the subject matter and why. For each stakeholder group the PEFC Poland Office shall identify the likely key issues, key stakeholders, and which means of communication would be best to reach them.</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			The PEFC Poland Office shall also identify disadvantaged stakeholders associated with the objectives and scope of the standard setting work, who will be invited to submit a representative to the working group developing the draft standard."
	Process	YES	<i>A stakeholder map was found.</i>
(c) Contacted and/or invited stakeholders,	Procedures	YES	PEFC PL 1001:2021 "5.1.10 The PEFC Poland Office shall keep records related to the standard setting process. (...) All documents and data shall be kept for at least five years. All records shall be available to interested parties upon request. 5.3.3 The PEFC Poland Office shall send an invitation to stakeholders to delegate their representatives to the Working Group."
	Process	YES	<i>Examples of e-mails and invitations to stakeholders were found.</i>
(d) Stakeholders involved in standard-setting activities including participants in each working group meeting,	Procedures	YES	PEFC PL 1001:2021 "5.1.10 The PEFC Poland Office shall keep records related to the standard setting process. (...) All documents and data shall be kept for at least five years. All records shall be available to interested parties upon request. 6.2 For the PEFC Council International approval process, the following documents shall be collected and retained for at least five years: c) Minutes of PEFC Poland Council meetings. d) Minutes of working group meetings."
	Process	NO	<i>Attendance lists of working group meetings were not found.</i>
(e) Feedback received and a synopsis of how feedback was addressed,	Procedures	YES	PEFC PL 1001:2021 "5.6 The PEFC Poland Office shall organise public consultation on the draft version and ensure that: g) a summary of the comments received on substantive issues (with information on their inclusion or rejection) was publicly available, e.g. on the website"
	Process	YES	<i>A document was found containing comments received and how the feedback was addressed.</i>
(f) All drafts and final versions of the standard,	Procedures	YES	PEFC PL 1001:2021 "6.1 In order to ensure transparency and public availability, all adopted drafts and documents approved by the PEFC Poland Board shall be published on the PEFC Poland website within four weeks of formal approval. The same applies

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			to the report on the amendment process, in particular including information on the handling of comments on complaints and appeals.”
	Process	YES	<i>The various drafts and final version of the standard were found.</i>
(g) Outcomes from working group considerations,	Procedures	YES	PEFC PL 1001:2021 “6.2 For the PEFC Council International approval process, the following documents shall be collected and retained for at least five years: d) Minutes of working group meetings. e) Evidence of consensus, e.g. summary of controversial issues and their resolution
	Process	YES	<i>Several e-mails were found discussing working group considerations and its outcomes.</i>
(h) Evidence of consensus on the final version of the standard(s),	Procedures	YES	PEFC PL 1001:2021 “6.2 For the PEFC Council International approval process, the following documents shall be collected and retained for at least five years: e) Evidence of consensus, e.g. summary of controversial issues and their resolution”
	Process	YES	<i>Digital signature documents were found in which the working group members voted on the approval of the final version of the standard.</i>
(i) Evidence relating to the review process, and	Procedures	YES	PEFC PL 1001:2021 “5.1.10 The PEFC Poland Office shall keep records related to the standard setting process. (...) All documents and data shall be kept for at least five years. All records shall be available to interested parties upon request. 6.1 In order to ensure transparency and public availability, all adopted drafts and documents approved by the PEFC Poland Board shall be published on the PEFC Poland website within four weeks of formal approval. The same applies to the report on the amendment process, in particular including information on the handling of comments on complaints and appeals. 6.2 For the PEFC Council International approval process, the following documents shall be collected and retained for at least five years: a) Description of the amendment process. b) Public announcements, e.g. about the start of an amendment process, a seminar or a consultation period. g) Proposal for transition periods for the implementation of new standards and procedures.”



PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
	Process	YES	<i>A development report was found as well as several e-mails and documents concerning the review process.</i>
(j) Final approval by the standardising body.	Procedures	YES	PEFC PL 1001:2021 “5.7.1 The formally approved standard shall be published on the PEFC Poland website. 6.1 In order to ensure transparency and public availability, all adopted drafts and documents approved by the PEFC Poland Board shall be published on the PEFC Poland website within four weeks of formal approval. 6.2 For the PEFC Council International approval process, the following documents shall be collected and retained for at least five years: c) Minutes of PEFC Poland Council meetings.”
	Process	YES	Announcement of the results of the vote of the PEFC Council Poland (translated with Google translate) “34 representatives of PEFC Polska Council members took part in the vote, which constituted 80.95% of those entitled to vote. Voting results in individual chambers: Chamber of Wood Industry and Processing of Non-Wood Raw Materials: for acceptance - 66.66% against admission - 0% abstained from voting – 33.34% Forest Chamber for acceptance - 94.74% against admission - 0% abstained from voting – 5.26% Social and Scientific Chamber for acceptance - 100.00% against admission - 0% abstained - 0% The voted documents were adopted by the PEFC Polska Council.”
5.2.2 Documented information shall be kept until completion of	Procedures	YES	PEFC PL 1001:2021 “5.1.10 The PEFC Poland Office shall keep records related to the standard setting process. All documents and data shall be kept for at least five years. Documents shall be stored electronically (scans, archived email files, etc.) and/or



PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
the next review or revision of the standard to which they refer. Otherwise the documented information must be kept for a minimum of five years after publication of the standard.			in paper form if paper documents were used. All records shall be available to interested parties upon request in a form which is accessible to them.”
	Process	YES	<i>PEFC Poland refers to the clause in PEFC PL 1001:2021 as their reference for the coming years.</i>
5.2.3 Documented information shall be available to interested parties upon request.	Procedures	YES	PEFC PL 1001:2021 “5.1.10 The PEFC Poland Office shall keep records related to the standard setting process. (...) All records shall be available to interested parties upon request.”
	Process	YES	<i>PEFC Poland refers to the clause in PEFC PL 1001:2021 as their reference for the coming years.</i>
5.3.1 The standardising body shall establish procedure(s) for dealing with any substantial and process complaints and appeals relating to its standard-setting activities. It must make procedure(s) accessible to stakeholders. Upon receipt of a complaint or appeal, the standardising body shall:			
(a) acknowledge receipt of the complaint or appeal to the complainant,	Procedures	YES	PEFC PL 1001:2021 “5.8.1 The PEFC Poland Office shall establish the following procedures for dealing with substantive or procedural complaints and appeals relating to standard setting/revising actions: a) provide the complainant with a written acknowledgement of the complaint or appeal;”
	Process	N.A.	Explanation provided by PEFC Poland “No complaints received.” <i>This is confirmed by respondents to the stakeholder survey.</i>
(b) gather and verify all necessary information to validate the	Procedures	YES	PEFC PL 1001:2021 “5.8.1 The PEFC Poland Office shall establish the following procedures for dealing with substantive or procedural complaints and appeals relating to standard setting/revising actions:

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
complaint or appeal, evaluate the subject matter of the complaint or appeal impartially and objectively, and make a decision regarding the complaint or appeal,			c) to collect and verify all information necessary for the validity of the complaint or appeal, to assess impartially and objectively the subject of the complaint or appeal and to decide on the complaint or appeal;"
	Process	N.A.	Explanation provided by PEFC Poland "No complaints received." <i>This is confirmed by respondents to the stakeholder survey.</i>
(c) formally communicate the decision on the complaint or appeal to the complainant and describe the handling process.	Procedures	YES	PEFC PL 1001:2021 "5.8.1 The PEFC Poland Office shall establish the following procedures for dealing with substantive or procedural complaints and appeals relating to standard setting/revising actions: b) to communicate the complaint handling procedure to the complainant; d) to send the complainant a formal decision on the complaint or appeal; e) making information about the complaint or appeal available to interested stakeholders"
	Process	N.A.	Explanation provided by PEFC Poland "No complaints received." <i>This is confirmed by respondents to the stakeholder survey.</i>
5.3.2 The standardising body shall establish at least one contact point for enquiries, complaints and appeals relating to its standard-setting activities. The contact point shall be easy to access and readily available.	Procedures	YES	PEFC PL 1001:2021 "5.8.2 The PEFC Poland Office is the contact point for questions, complaints and appeals related to the process of standards setting/revisions. 5.8.3 In order to ensure the proper functioning of the appeal procedure, the Board of PEFC Poland shall establish an appeal committee to deal with appeals, complaints and disputes."
	Process	NO	<i>While a general address and email address can be found on the PEFC Poland website, no reference is found on the website that for enquires, complaints and appeals these addresses (or a specific contact point for enquiries, complaints and appeals) shall be used.</i>
Standard-setting process			
6.1.1 For the creation of a new standard, the standardising body shall develop a proposal including:			



PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
(a) the scope of the standard,	Procedures	YES	PEFC PL 1001:2021 “5.2.8 For the creation of a new standard, the PEFC Poland shall develop a proposal including: a) the scope of the standard”
	Process	N.A.	<i>During this revision, no new standard was developed.</i>
(b) a justification of the need for the standard,	Procedures	YES	PEFC PL 1001:2021 “5.2.8 b) justification of the need for the standard”
	Process	N.A.	<i>During this revision, no new standard was developed.</i>
(c) a clear description of the intended outcomes	Procedures	YES	PEFC PL 1001:2021 “5.2.8 c) a clear description of the intended outcomes”
	Process	N.A.	<i>During this revision, no new standard was developed.</i>
(d) a risk assessment of potential negative impacts arising from implementing the standard, such as • factors that could affect the achievement of the outcomes negatively, • unintended consequences of implementation, • actions to address the identified risks, and	Procedures	YES	PEFC PL 1001:2021 “5.2.9 d) a risk assessment of potential negative impacts arising from implementing the standard, such as; •factors that could affect the achievement of the outcomes negatively, •unintended consequences of implementation, •actions to address the identified risks, and2 (...) In setting a new standard, a proposal shall be developed that includes a risk assessment.”
	Process	N.A.	<i>During this revision, no new standard was developed.</i>
(e) a description of the stages of standard	Procedures	YES	PEFC PL 1001:2021 “5.2.8 e) a description of the stages of standard development and their expected timetable.”



PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
development and their expected timetable. ⁹	Process	N.A.	<i>During this revision, no new standard was developed.</i>
6.1.2 For the revision of a standard the proposal shall cover at least (a) and (e) of clause 6.1.1.	Procedures	YES	PEFC PL 1001:2021 "5.2.9 For the revision of a standard the proposal shall cover at least (a) and (e) of clause 5.2.8."
	Process	NO	<p>Public announcement 11 May 2021 found on PEFC Poland website (translated with Google translate)</p> <p>"Last year, the PEFC Polska Council, at the General Meeting, started the process of amending the national PEFC system. (...) The main reasons for the current revision of Polish PEFC standards are:</p> <ul style="list-style-type: none"> - adaptation to the requirements of PEFC Int. - in 2018, the amendment of the meta-standard PEFC ST 103:2018 Sustainable Forest Management - Requirements was completed; - adaptation to the requirements and practices applied in Poland; - improving the transparency and clarity of documents to facilitate their practical use. <p>One of the basic assumptions of recognizing criteria and certification in the PEFC system is to ensure participation in their creation by all legal and natural persons interested in forestry, nature conservation and sustainable development. Therefore, we invite you to take an active part in the planned works. Within the next month (until June 11) we are waiting for nominations of people who will be your representatives in working groups (application form). (...) The amendment work will be carried out in accordance with the principles described in the PEFC PL 1001:2021 Standard Procedures standard."</p> <p>Explanation provided by PEFC Poland</p> <p>"At the General Meetings of the PEFC Poland Council we often spoke about the next steps in the process of amending the standard. The inclusion of a standard (in announcement) describing these stages seemed sufficient to us. As for timetable - we were operating in a pandemic situation on the one hand, on the other hand we had experience from the previous revision, during which we received a lot of comments and remarks to be discussed within the working group."</p> <p><i>The announcement includes a description of the first stage of the standard revision process, and reference is made to the standard-setting procedures, which includes all stages. However, an expected timetable is not found.</i></p>
	Procedures	YES	PEFC PL 1001:2021

⁹ NOTE Guidance for development of a proposal and justification is given in ISO Directives, Part 1, Annex C and Annex SL (Appendix 1).



PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
6.2.1 The standardising body shall identify stakeholders relevant to the objectives and scope of the standard-setting activities by means of a stakeholder identification mapping exercise. It shall define which stakeholder groups are relevant to the subject matter and why. For each stakeholder group the standardising body shall identify the likely key issues, key stakeholders, and which means of communication would be best to reach them.			“5.2.11 The PEFC Poland Office shall identify stakeholders relevant to the objectives and scope of the standard-setting activities by means of a stakeholder identification mapping exercise. It shall define which stakeholder groups are relevant to the subject matter and why. For each stakeholder group the PEFC Poland Office shall identify the likely key issues, key stakeholders, and which means of communication would be best to reach them.”
	Process	NO	Explanation provided by PEFC Poland “Key stakeholders and key issues were identified at the previous revision. Later, with the current revision, the list was updated. (...) As for the communication itself, the 3G network covers almost the entire area of Poland and access to websites and e-mail is not hindered in any way. In terms of mobile internet access, Poland was in the highest position. The penetration of the service in July 2020 in our country was (...) higher than the EU average” <i>A stakeholder identification document was found, which includes a list of stakeholders, their addresses, key expertise and gender. However, no document is found providing background to the stakeholder identification, including 1) defining which stakeholder groups are relevant to the subject matter and why, 2) likely key issues, 3) identification of key stakeholders, and 4) which means of communication would be best to reach them.</i>
6.2.2 Identification of stakeholder groups shall be based on nine major stakeholder groups as defined by Agenda 21 of the <i>United Nations Conference on Environment and Development</i> (UNCED) in Rio de Janeiro in	Procedures	YES	PEFC PL 1001:2021 “5.1.12 The identification of stakeholders shall be based on the nine main stakeholder groups identified in the Agenda 21 action programme at the United Nations Conference on Environment and Development (UNCED) in Rio de Janeiro in 1992. The stakeholder mapping shall therefore include at least the following groups: - forest owners and managers, - business and industry, - forestry entrepreneurs, - NGOs, - scientific and technological communities,



PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
1992. At least the following groups shall be included in the stakeholder mapping: <ul style="list-style-type: none"> • forest owners, • business and industry, • indigenous people, • non-government organisations, • scientific and technological community, • workers and trade unions. Other groups shall be added if relevant to the scope of standard-setting activities. ¹⁰	Process	YES	<p>- workers and trade unions.”</p> <p><i>It shall be noted that there are no indigenous people in Poland.</i></p> <p>Explanation provided by PEFC Poland</p> <p>“The PEFC Int. standard implies that at least six groups should be included:</p> <ul style="list-style-type: none"> a) forest owners, b) business and industry, c) indigenous people, d) non-government organizations, e) scientific and technological community, f) workers and trade unions. <p>And these groups have been included, except for indigenous peoples, who are not found in Poland. However, we have included a women's organization, bringing together women working in the forestry sector.”</p> <p><i>Since the stakeholder mapping exercise was not carried out satisfactorily (see comment under requirement 6.2.1), the requirement could not be assessed based on the stakeholder mapping. However, the working group (which could be considered a representation of the stakeholders) included all groups except the indigenous people. It can therefore be concluded that the stakeholder mapping included these groups.</i></p>
6.2.3 The standardising body shall identify disadvantaged stakeholders and key stakeholders and address any constraints to their participation in	Procedures	YES	<p>PEFC PL 1001:2021</p> <p>“5.2.11 The PEFC Poland office shall identify stakeholders (...). For each stakeholder group the PEFC Poland Office shall identify the likely key issues, key stakeholders, and which means of communication would be best to reach them. For each stakeholder group the PEFC Poland Office shall identify the likely key issues, key stakeholders, and which means of communication would be best to reach them.</p> <p>The PEFC Poland Office shall also identify disadvantaged stakeholders associated with the objectives and scope of the standard setting work, who will be invited to submit a representative to the working group developing the draft standard. The PEFC Office shall consider any impediments to their participation in the standard setting activities.”</p>

¹⁰ 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.

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
standard-setting activities. ¹¹	Process	YES	Explanation provided by PEFC Poland “From the analysis of the situation in our country, considering the groups listed in the PEFC Int standard, two groups of potentially disadvantaged stakeholders should be taken into account: - private forest owners (potentially deciding to opt for PEFC certification). For this purpose, we contacted the Polish Union of Private Forest Owners. We did not receive any response. - forest entrepreneurs, who carry out more than 90% of forestry work in the State Forests. We contacted the Association of Forest Entrepreneurs in Goluchow (https://www.splgoluchow.pl/kontakt/). With similar results.”
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 ¹² through suitable media ¹³ , as appropriate, to give stakeholders an opportunity for	Procedures	YES	PEFC PL 1001:2021 “5.2.7 The commencement of the process of setting/revising the standard shall be publicly communicated by the PEFC Poland Office (e.g. website, press release). 5.2.10 Communication mentioned in 5.2.7 shall contain information about the objectives, scope, work schedule and opportunities for participation. It shall also refer to the process of revision of the standard and encourage participants to comment on its scope and content and in due time (at least 4 weeks before the first standardization activity starts) put an invitation to participate in the process on its website and publish relevant information in the media to enable stakeholders to participate in a meaningful way. 5.3.3 The PEFC Poland Office shall send an invitation to stakeholders to delegate their representatives to the Working Group.”
	Process	YES	Public announcement 11 May 2021 found on PEFC Poland website (translated with Google translate) “Last year, the PEFC Poland Council, at the General Assembly, started the process of amending the national PEFC system. Therefore, we would like to invite you to submit your representatives to work in the working group (...) Within the next month (until June 11 this year) we are waiting for nominations of people who will represent you in working groups (application form).”

¹¹ NOTE A stakeholder can be both a disadvantaged and a key stakeholder at the same time.

¹² NOTE 1 *In a timely manner* means (at the latest) four weeks before the first standard-setting activity is scheduled to occur.

¹³ NOTE 2 *Through suitable media* means at least through the standardising body’s website and by email and/or letter to identified stakeholders. Other media includes press releases, news articles, features in trade-press, information sent to branch organisations, social media, digital media, etc.



PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
meaningful contributions.			<i>The announcement was published on the PEFC Poland website as well as in a forest magazine. Identified stakeholders were also contacted by mail, by e-mail and, occasionally, by phone. The deadline for submitting interest in participating in the process was 1 month after the announcement.</i>
6.3.1 The announcement and invitation shall include:			
(a) overview of the standard-setting process,	Procedures	YES	PEFC PL 1001:2021 “5.2.10 Communication mentioned in 5.2.7 shall contain information about the objectives, scope, work schedule and opportunities for participation. It shall also refer to the process of revision of the standard (...). 5.3.3 (...) The invitation shall include: b) information on the objectives, scope and stages of the standard-setting process and its timescale,”
	Process	YES	Public announcement 11 May 2021 found on PEFC Poland website (translated with Google translate) “Therefore, we invite you to take an active part in the planned works. Within the next month (until June 11) we are waiting for nominations of people who will be your representatives in working groups (application form). (...) The amendment work will be carried out in accordance with the principles described in the PEFC PL 1001:2021 Standard Procedures standard.” Explanation provided by PEFC Poland “The inclusion of a standard (in announcement) describing these stages seemed sufficient to us. As for timetable - we were operating in a pandemic situation on the one hand, on the other hand we had experience from the previous revision, during which we received a lot of comments and remarks to be discussed within the working group.” <i>The announcement includes a description of the first stage of the standard revision process, and reference is made to the standard-setting procedures, which includes all (potential) steps of the process.</i>
(b) access to the proposal for the standard (refer to 6.1),	Procedures	YES	PEFC PL 1001:2021 “5.2.7 The commencement of the process of setting/revising the standard shall be publicly communicated by the PEFC Poland Office (e.g. website, press release). 5.2.10 Communication mentioned in 5.2.7 shall contain information about the objectives, scope, work schedule and opportunities for participation.”



PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
	Process	YES	<p>Public announcement 11 May 2021 found on PEFC Poland website (translated with Google translate)</p> <p>“Last year, the PEFC Polska Council, at the General Meeting, started the process of amending the national PEFC system. (...) The main reasons for the current revision of Polish PEFC standards are:</p> <ul style="list-style-type: none"> - adaptation to the requirements of PEFC Int. - in 2018, the amendment of the meta-standard PEFC ST 103:2018 Sustainable Forest Management - Requirements was completed; - adaptation to the requirements and practices applied in Poland; - improving the transparency and clarity of documents to facilitate their practical use. <p>One of the basic assumptions of recognizing criteria and certification in the PEFC system is to ensure participation in their creation by all legal and natural persons interested in forestry, nature conservation and sustainable development. Therefore, we invite you to take an active part in the planned works. Within the next month (until June 11) we are waiting for nominations of people who will be your representatives in working groups (application form). (...) The amendment work will be carried out in accordance with the principles described in the PEFC PL 1001:2021 Standard Procedures standard.”</p>
(c) information about opportunities for stakeholders to participate in the process,	Procedures	YES	<p>PEFC PL 1001:2021</p> <p>“5.2 10 Communication mentioned in 5.2.7 shall also refer to the process of revision of the standard and encourage participants to comment on its scope and content and in due time (...) put an invitation to participate in the process on its website and publish relevant information in the media to enable stakeholders to participate in a meaningful way.</p> <p>5.3.3 (...) The invitation shall include:</p> <p>c) information about opportunities for stakeholder participation in the process,”</p>
	Process	YES	<p>Public announcement 11 May 2021 found on PEFC Poland website (translated with Google translate)</p> <p>“(…) Therefore, we would like to invite you to take an active part in the planned works. Within the next month (until June 11 this year) we are waiting for nominations of people who will represent you in working groups (application form).”</p>
(d) requests to stakeholders to nominate their representative(s) or themselves to the	Procedures	YES	<p>PEFC PL 1001:2021</p> <p>“5.2.10 Communication (...) shall contain (...) an invitation to participate in the process on its website and publish relevant information in the media to enable stakeholders to participate in a meaningful way.</p> <p>5.2.11 The PEFC Poland Office 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</p>



PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
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,			relevant to the subject matter and why. For each stakeholder group the PEFC Poland Office shall identify the likely key issues, key stakeholders, and which means of communication would be best to reach them. The PEFC Poland Office shall also identify disadvantaged stakeholders associated with the objectives and scope of the standard setting work, who will be invited to submit a representative to the working group developing the draft standard. 5.3.3 The PEFC Poland Office shall send an invitation to stakeholders to delegate their representatives to the Working Group. 5.3.3 (...) The invitation shall include: d) the proposal that stakeholders nominate their representatives to the working group.”
	Process	YES	Public announcement 11 May 2021 found on PEFC Poland website (translated with Google translate) “Therefore, we would like to invite you to submit your representatives to work in the working group.” Explanation provided by PEFC Poland “Announcement on the website, e-mail contact, telephone contact. Information about the recruitment to the working group and public consultations was announced on the PEFC Poland website. The Internet is available in almost every region of Poland.”
(e) explicit invitation and clear instruction on how to submit feedback on the scope and standard-setting process, and	Procedures	YES	PEFC PL 1001:2021 “5.2.7 The commencement of the process of setting/revising the standard shall be publicly communicated by the PEFC Poland Office (e.g. website, press release). 5.2.10 Communication mentioned in 5.2.7 shall (...) also refer to the process of revision of the standard and encourage participants to comment on its scope and content (...)”
	Process	YES	Public announcement 11 May 2021 found on PEFC Poland website (translated with Google translate) “We would like to ask you for comments, remarks, suggestions for changes to the project, using the form below. Please contact us by e-mail (k.jodlowski@ibles.waw.pl, w.mlynarski@ibles.waw.pl, pefc@ibles.waw.pl) or by post (PEFC Polska Office, Forest Research Institute, ul. Braci Leśna 3, 05-090 Sękocin Stary) until January 28, 2022.”
(f) access to the standard-setting procedures.	Procedures	YES	PEFC PL 1001:2021 “5.3.3 (...) The invitation shall include: f) reference to publicly available standard setting procedures (on PEFC Poland website).
	Process	YES	Public announcement 11 May 2021 found on PEFC Poland website (translated with Google translate)



PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>"The amendment works will be carried out in accordance with the principles described in the PEFC PL 1001: 2021 Standard Establishing Procedure."</p> <p><i>The online announcement includes a link to PEFC PL 1001:2021.</i></p>
6.3.2 The standardising body shall review the standard-setting process based on feedback received in response to the public announcement.	Procedures	YES	<p>PEFC PL 1001:2021</p> <p>"5.6 The PEFC Poland shall review the standard-setting process based on feedback received in response to the public announcement."</p>
	Process	N.A.	<p>Explanation provided by PEFC Poland</p> <p>"We have received no such signals."</p> <p><i>PEFC Poland explained that no feedback was received on the standard setting process in response to the public announcement.</i></p>
6.4.1 The standardising body shall establish a permanent or temporary working group or adjust the composition of an already existing working group based on nominations it received. Acceptance and refusal of nominations shall be justified in relation to the requirements for balanced representation of the working group, considerations of an appropriate gender balance, relevance of the organisation, an	Procedures	YES	<p>PEFC PL 1001:2021</p> <p>"5.3.1 The PEFC Poland Office shall appoint members to a working group which shall carry out the amendment process.</p> <p>5.3.2 PEFC Poland Office shall appoint members for the Working Group from the widest possible range of stakeholders such as forest owners, forest managers and forest land managers, organizations involved in production and sale of products containing forest products, entrepreneurs, consumer, environmental, youth organizations, local authorities and scientific institutions (see 5.2.3 and 5.2.4). The PEFC Poland Office shall make every effort to ensure that they are not discriminated against for ideological, social or economic reasons.</p> <p>5.3.4 On the basis of the submissions received, a working group shall be set up which is responsible for the activities related to the setting/revision of the standard. The working group shall:</p> <p>c) include stakeholders with knowledge and experience related to the subject matter of the standard, stakeholders who will be materially affected by the standard and those who can influence the implementation of the standard.</p> <p>5.3.5 The acceptance or rejection of the representatives' application shall be justified in terms of the requirement for balanced composition of the Working Group and available resources.</p>
	Process	NO	<p><i>No evidence was found on how acceptance and refusal of nominations for the working group was based on gender balance, relevance of the organisation, an individual's competence, an individual's relevant experience and resources available for standard-setting.</i></p>



PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)																														
individual’s competence, an individual’s relevant experience and resources available for standard-setting.																																	
6.4.2 The working group shall:																																	
(a) have balanced representation and decision-making by stakeholder categories, relevant to the subject matter and geographical scope of the standard, where no single concerned stakeholder group can dominate, nor be dominated in the process, and	Procedures	YES	PEFC PL 1001:2021 “5.3.4 The working group shall: b) have balanced representation and participation in decision-making by all categories of stakeholders related to the subject matter and the geographical scope of the standard, while taking into account balanced gender participation, so that one stakeholder does not dominate the whole process or be dominated in the process, and”																														
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PEFC Conformity Assessment of the Polish Forest Certification System

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)					
							Executor of nature conservation plans for reserves.	
			5	Kolman	Urban	Union of Polish Foresters in the Republic of Poland	In the LP since 1982, vice-chairman of the Union of Polish Foresters of the People's Republic of Poland.	M
			6	Nowakowski	Andrzej	RDSF Krosno / State Forests, Regional Directorate	Graduate of Academy of Mining and Metallurgy and University of Life Science. 14 years working at BULiGL (forest inventory-taxator), 11 years at RDSF Krosno (Forest Management Division), senior specialistSL (habitat science, silviculture, certification, SIP.	M
			7	Oktaba	Jarosław	Association of Forestry and Wood Engineers and Technicians / Association of Foresters and Wood Technologists	Member of the Board of PEFC Poland, employee of the Department of Forest Management at the Warsaw University of Life Sciences (SGGW), PhD in forestry	M
			8	Pigan	Iza	Women in Forestry Association	Chairwoman of association, PhD in forestry	F
			9	Referowska-Chodak	Ewa	The Polish Forestry Society - Main Board	Member of the Management Board of PEFC Poland, cooperation in the development of the previous PEFC standard for forest management, conducting training and examinations for PEFC auditors, PhD in forestry	F
			10	Stanula	Zygmunt	Stelmet S.A., National Association of Garden Program Producers / Industry, National Association of Garden Program Producers	Purchasing Director, member of the commission (development of technical conditions for coniferous logs), member of the Timber Industry Consultative Panel 2013, development of rules for timber sales by PGL LP), timber industry representative on the Board of the Employers' Council at the WL UP in Poznań. Expert in the project National Forest Programme.	M



PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)														
			11	Szeffler	Rafał	Polish Economic Chamber of Wood Industry / Polish Economic Chamber of Wood Industry	He has been working at PIGPD since January 2013.	M									
			12	Zieliński	Damian	DGLP / Directorate General of State Forests	13 years at DGLP, 10 years working with compliance systems relating to forestry and the timber industry, EUSTAFOR consultant, coordinator of the certification process in SF.	M									
			<p>Explanation provided by PEFC Poland</p> <p>“The PEFC Int. standard implies that at least six groups should be included:</p> <p>a) forest owners,</p> <p>b) business and industry,</p> <p>c) indigenous people,</p> <p>d) non-government organizations,</p> <p>e) scientific and technological community,</p> <p>f) workers and trade unions.</p> <p>And these groups have been included, except for indigenous peoples, who are not found in Poland. However, we have included a women's organization, bringing together women working in the forestry sector (...) 12 representatives were elected to the working group.</p> <table><tr><th>Type of organization</th><th>Number</th></tr><tr><td>Foresters (State Forests)</td><td>3</td></tr><tr><td>NGO</td><td>5</td></tr><tr><td>Wood industry</td><td>3</td></tr><tr><td>Trade Unions</td><td>1</td></tr><tr><td></td><td>12</td></tr></table> <p>we have included a women's organization, bringing together women working in the forestry sector.”</p> <p><i>Although no environmental NGOs participated (no nominations), this was solved by including scientists with environmental background, such as J. Koba from the Polish Forestry Society.</i></p>						Type of organization	Number	Foresters (State Forests)	3	NGO	5	Wood industry	3	Trade Unions
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(b) include stakeholders with expertise relevant to the subject matter of the standard, those that affected by the standard, and those that can influence implementation of the standard. The affected stakeholders shall be represented in an appropriate proportion among participants.	Procedures	YES	PEFC PL 1001:2021 “5.3.4 The working group shall: c) include stakeholders with knowledge and experience related to the subject matter of the standard, stakeholders who will be materially affected by the standard and those who can influence the implementation of the standard. Stakeholders who will be materially affected by the standard shall make up a significant proportion of participants.”																																									
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PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)					
							RDSF Krosno (Forest Management Division), senior specialistSL (habitat science, silviculture, certification, SIP.	
			7	Oktaba	Jarosław	Association of Forestry and Wood Engineers and Technicians / Association of Foresters and Wood Technologists	Member of the Board of PEFC Poland, employee of the Department of Forest Management at the Warsaw University of Life Sciences (SGGW), PhD in forestry	M
			8	Pigan	Iza	Women in Forestry Association	Chairwoman of association, PhD in forestry	F
			9	Referowska-Chodak	Ewa	The Polish Forestry Society - Main Board	Member of the Management Board of PEFC Poland, cooperation in the development of the previous PEFC standard for forest management, conducting training and examinations for PEFC auditors, PhD in forestry	F
			10	Stanula	Zygmunt	Stelmet S.A., National Association of Garden Program Producers / Industry, National Association of Garden Program Producers	Purchasing Director, member of the commission (development of technical conditions for coniferous logs), member of the Timber Industry Consultative Panel 2013, development of rules for timber sales by PGL LP), timber industry representative on the Board of the Employers' Council at the WL UP in Poznań. Expert in the project National Forest Programme.	M
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PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)																																			
							timber industry, EUSTAFOR consultant, coordinator of the certification process in SF.																															
			The working group included stakeholders that can influence implementation of the standard (e.g. Stora Enso and State Forest) and with expertise relevant to the subject matter of the standard.																																			
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. ¹⁴ The standardising body shall set targets for the participation of key stakeholders and proactively seek their participation by using outreach such as (but not limited to) personal emails, phone calls, meeting invitations etc.	Procedures	YES	PEFC PL 1001:2021 “5.3.2 PEFC Poland Office shall appoint members for the Working Group from the widest possible range of stakeholders such as forest owners, forest managers and forest land managers, organizations involved in production and sale of products containing forest products, entrepreneurs, consumer, environmental, youth organizations, local authorities and scientific institutions (see 5.2.3 and 5.2.4). The PEFC Poland Office shall make every effort to ensure that they are not discriminated against for ideological, social or economic reasons.” <i>Although no specific targets are defined for the participation of key stakeholders, clause 5.2.3 requires an inclusion of the widest possible range of stakeholders, which includes key stakeholders. Furthermore, they are required to make every effort to ensures a non-discriminating selection. Effectively this will result in the participation of key stakeholders.</i>																																			
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¹⁴ NOTE When a stakeholder group is not represented and key stakeholders cannot be encouraged to participate, the standardising body may consider alternative options.



PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)					
							forest management, forest typology, habitat basis of silviculture, phytosociology of forest complexes, anthropomorphic transformation of forest complexes. research from 2009-2014. Executor of nature conservation plans for reserves.	
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			10	Stanula	Zygmunt	Stelmet S.A., National Association of Garden Program Producers / Industry, National	Purchasing Director, member of the commission (development of technical conditions for coniferous logs), member of the Timber Industry Consultative Panel 2013, development of rules for timber sales by PGL LP), timber	M



PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)						
						Association of Garden Program Producers	industry representative on the Board of the Employers' Council at the WL UP in Poznań. Expert in the project National Forest Programme.		
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			Explanation provided by PEFC Poland						
			“The PEFC Int. standard implies that at least six groups should be included: a) forest owners, b) business and industry, c) indigenous people, d) non-government organizations, e) scientific and technological community, f) workers and trade unions. And these groups have been included, except for indigenous peoples, who are not found in Poland. However, we have included a women's organization, bringing together women working in the forestry sector (...) 12 representatives were elected to the working group.						
		Type of organization		Number					
		Foresters (State Forests)		3					
		NGO		5					
		Wood industry		3					



PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)				
			<table><tr><td>Trade Unions</td><td>1</td></tr><tr><td></td><td>12</td></tr></table> <p>Although no environmental NGOs participated (no nominations), this was solved by including scientists with environmental background, such as J. Koba from the Polish Forestry Society.</p>	Trade Unions	1		12
Trade Unions	1						
	12						
6.4.4 Activities of the working group shall be organised in an open and transparent manner where:							
(a) working drafts shall be available to all members of the working group,	Procedures	YES	PEFC PL 1001:2021 “5.5.2 The work of the Working Group shall be organised in an open and public manner, i.e: a) draft versions shall be made available to all members of the working group/committee”				
	Process	YES	Explanation provided by PEFC Poland “Before each meeting of the working group, its participants received a set of documents for discussion at the meeting.” <i>E-mails to working group members were found, including working drafts of the standard. This is confirmed by respondents to the stakeholder survey.</i>				
(b) all members of the working group shall be given meaningful opportunities to contribute to the development or revision of the standard and to provide feedback on working drafts, and	Procedures	YES	PEFC PL 1001:2021 “5.5.2 (...) b) all members of the working group shall have a real opportunity to be involved in the development or revision of the standard and to comment on draft versions”				
	Process	YES	<i>E-mails to working group members were found, including working drafts of the standard and summarized results from the working group meetings. Respondents to the stakeholder survey confirmed that they were given meaningful opportunities to contribute to the revision of the standard and to provide feedback on working drafts.</i>				
(c) feedback and views given by any member of the working group shall be considered in an open and transparent way where the outcome	Procedures	YES	PEFC PL 1001:2021 “5.5.2 (...) c) Comments and opinions made by a member of the working group shall be considered in an open and public manner, and proposed changes, their acceptance or rejection, shall be documented.”				
	Process	YES	<i>E-mails to working group members were found, including working drafts of the standard and summarized results from the working group meetings. Respondents to the stakeholder survey confirmed that feedback and views given by members of the working group were considered in an open and transparent way.</i>				



PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
of these considerations is recorded.			
6.4.5 The decision of the working group to recommend the final draft for formal approval shall be taken on the basis of consensus. In order to determine whether there is any sustained opposition, the working group can utilise the following methods:			
(a) face-to face meeting(s) where there is a verbal yes/no vote, a show of hands for a yes/no vote; a statement on consensus from the Chair when there are no dissenting voices or hands (votes); a formal ballot, etc.,	Procedures	YES	PEFC PL 1001:2021 “5.5.3 (...) the decision to recommend the final version for final approval shall be made by consensus. To determine whether there is an objection, the Working Group may use one of the following methods: a) a face-to-face meeting with an oral yes/no vote; a vote by a show of hands for yes/no; a statement by the Chair that a consensus has been reached without a vote against (or without an objection expressed by a show of hands); b) a face-to-face meeting with a secret yes/no vote;”
	Process	N.A.	Explanation provided by PEFC Poland “All meetings were held in an online format. The decision to formally adopt the final draft by the working group was made by online voting.”
(b) telephone conference meeting(s) where there is a verbal yes/no vote,	Procedures	YES	PEFC PL 1001:2021 “5.5.3 (...) the decision to recommend the final version for final approval shall be made by consensus. To determine whether there is an objection, the Working Group may use one of the following methods: c) teleconference with oral vote yes/no; d) teleconference with secret ballot yes/no (via web-based application);”
	Process	N.A.	Explanation provided by PEFC Poland “All meetings were held in an online format. The decision to formally adopt the final draft by the working group was made by online voting.”
(c) e-mail request to the working group for agreement or objection where the members provide a formal	Procedures	YES	PEFC PL 1001:2021 “5.5.3 (...) the decision to recommend the final version for final approval shall be made by consensus. To determine whether there is an objection, the Working Group may use one of the following methods: e) an emailed request to the working group to agree or disagree when members submit a formal written response (vote), or”

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
(written) response (vote),	Process	YES	E-mail from PEFC Poland to the members of the working group 27 April 2022 “Today's meeting of the working group was the last one at this stage of work. The next step is the formal approval, in an online group vote, of the final versions of the documents for formal approval by the PEFC Polska Council. An online voting form is attached.”
(d) combinations of these methods.	Procedures	YES	PEFC PL 1001:2021 “5.5.3 (...) the decision to recommend the final version for final approval shall be made by consensus. To determine whether there is an objection, the Working Group may use one of the following methods: f) a combination of the above methods.”
	Process	YES	Explanation provided by PEFC Poland “All meetings were held in an online format. The decision to formally adopt the final draft by the working group was made by online voting.”
6.4.6 Where a vote is used in decision-making, the standard-setting procedures shall determine and include decision-making thresholds that quantifies consensus. The threshold must be consistent with the consensus definition (refer to 3.1). However, a majority vote cannot override sustained opposition in order to achieve consensus.	Procedures	YES	PEFC PL 1001:2021 “5.5.4 Decisions of the Working Group will be adopted by a qualified majority with at least 2/3 of all members in favour and no more than 1/4 of votes against. However, a majority vote cannot override sustained opposition in order to achieve consensus.”
	Process	YES	Email informing the PEFC Poland Council of the results of the working group's vote (May 2, 2022) “The working group for the amendment of the Polish PEFC forest management certification system has completed its work and adopted the final version of the documents in an online vote. Twelve persons entitled to vote took part in the voting: 11 persons voted for their acceptance, 1 person abstained from voting. Thus, the working group recommends these documents for formal adoption by the PEFC Polska Council, in accordance with PEFC PL 1001:2021 Standard setting procedures. <i>The email invitation to the PEFC Council members to officially approve the standard, includes the evidence that consensus has been reached among the working group members. There was no sustained opposition.</i>
6.4.7 When there is sustained opposition to a substantial issue, the issue shall be resolved using the following methods:			
	Procedures	YES	PEFC PL 1001:2021

PEFC benchmark requirement	Assessment 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,			“5.5.5 In the event of a negative outcome that represents a continuing objection to an important part of one of the relevant issues, the situation shall be resolved by the following mechanisms: a) discussion and negotiation on a controversial point within the working group in order to find a compromise”
	Process	N.A.	Explanation provided by PEFC Poland “There was no sustained opposition.”
(b) finding a compromise through direct negotiation between the stakeholder(s) making the objection and other stakeholders with different views on the disputed issue,	Procedures	YES	PEFC PL 1001:2021 “5.5.5 In the event of a negative outcome that represents a continuing objection to an important part of one of the relevant issues, the situation shall be resolved by the following mechanisms: b) direct negotiations between objecting and opposing stakeholders to find a compromise”
	Process	N.A.	Explanation provided by PEFC Poland “There was no sustained opposition.”
(c) additional round(s) of public consultation (if necessary) where further stakeholder input can help to achieve consensus on unresolved issues. The standardising body determines the scope and duration of any additional public consultation.	Procedures	YES	PEFC PL 1001:2021 “5.5.5 In the event of a negative outcome that represents a continuing objection to an important part of one of the relevant issues, the situation shall be resolved by the following mechanisms: c) additional round(s) of public consultation (if necessary) where further stakeholder input can help to achieve consensus on unresolved issues. The PEFC Poland determines the scope and duration of any additional public consultation.”
	Process	N.A.	Explanation provided by PEFC Poland “There was no sustained opposition.”
6.4.8 When a substantial issue cannot be resolved and	Procedures	YES	PEFC PL 1001:2021 “5.5.6 When a substantial issue cannot be resolved and sustained opposition persists, the PEFC Poland shall initiate dispute resolution process (e.g. arbitration).”



PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
sustained opposition persists, the standardising body shall initiate dispute resolution in accordance with its procedures for impartial and objective action.	Process	N.A.	Explanation provided by PEFC Poland “There was no sustained opposition.”
6.5.1 The standardising body shall organise public consultation on the enquiry draft and shall ensure that:			
(a) the start and the end dates of public consultation are announced in a timely manner ¹⁵ through suitable media,	Procedures	YES	PEFC PL 1001:2021 “5.6 The PEFC Poland Office shall organise public consultation on the draft version and ensure that: a) the start and closing date of the public consultation was announced in accessible media at least one day before the start of the public consultation”
	Process	YES	Public announcement 25 November 2021 found on PEFC Poland website (translated with Google translate) “we would like to ask you for your comments, remarks, and suggestions for changes to the project, using the form below. Please contact us by e-mail (...) or by post (...) by January 28, 2022.” <i>The announcement of the public consultation was placed on the website of PEFC Poland on 25 November 2021. No specific start date is mentioned, but the wording suggests that stakeholders were requested to submit their comments from that day, which is not one day before the start. However, it is noted that without the announcement day, the public consultation still lasted for 63 days, and the intend of the requirement is met.</i> <i>Observation: announcing the public consultation on a website is a relatively passive approach, as it cannot be assumed that all stakeholders will regularly check the website. Also an E-mail was sent, which however dated from 20 December 2021, after which only 40 days remained for responding.</i>
(b) a direct invitation to comment on the enquiry draft is sent to each stakeholder	Procedures	YES	PEFC PL 1001:2021 “5.6 The PEFC Poland Office shall organise public consultation on the draft version and ensure that: b) A direct invitation to comment on the draft version was sent to each stakeholder identified as a result of the stakeholder identification with the aim of balanced participation of stakeholder groups”

¹⁵ NOTE In a timely manner means (at the latest) the day before the start of public consultation.



PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
identified by stakeholder identification mapping (refer to 6.2) aiming for a balanced participation of stakeholder groups,	Process	YES	<p>Public announcement 25 November 2021 found on PEFC Poland website (translated with Google translate)</p> <p>“The process of amending the sustainable forest management standard is moving to the next stage. A working group consisting of representatives of forest owners and managers, women forestry workers, forest sciences, NGOs and the timber industry developed a draft standard. The next, very important stage of the amendment is public consultation of the developed proposal.</p> <p>Therefore, we would like to ask you for comments, remarks, suggestions for changes to the project, using the form below. Please contact us by e-mail (k.jodlowski@ibles.waw.pl, w.mlynarski@ibles.waw.pl, pefc@ibles.waw.pl) or by post (PEFC Polska Office, Forest Research Institute, ul. Braci Leśna 3, 05-090 Sękocin Stary) until January 28, 2022.”</p> <p>Explanation provided by PEFC Poland</p> <p>“In addition to information on the website, emails were addressed to identified stakeholders.”</p> <p><i>An e-mail was found with a similar invitation.</i></p>
(c) invitations are sent to disadvantaged and key stakeholders by methods that ensure they reach recipients and are easy to understand,	Procedures	YES	<p>PEFC PL 1001:2021</p> <p>“5.6 The PEFC Poland Office shall organise public consultation on the draft version and ensure that:</p> <p>c) Invitations to key stakeholders and disadvantaged stakeholders were prepared so that the information reached the recipients and was in a form they could understand”</p>
	Process	YES	<p><i>The invitation was placed on the PEFC Poland website and was sent by Email to stakeholders. For the Polish context it is assumed that website and especially Email communication are methods that ensure they reach recipients and are easy to understand.</i></p>
(d) the enquiry draft is made publicly available,	Procedures	YES	<p>PEFC PL 1001:2021</p> <p>“5.6 The PEFC Poland Office shall organise public consultation on the draft version and ensure that:</p> <p>d) a preliminary version was publicly available”</p> <p><i>Observation: the wording “preliminary version” is a bit vague, it is assumed that this is the enquiry draft (or “draft version” as in the first sentence of clause 5.6.</i></p>
	Process	YES	<p><i>A link to the enquiry draft was found in the public announcement.</i></p>
(e) public consultation is for at least 60 days,	Procedures	YES	<p>PEFC PL 1001:2021</p> <p>“5.6 The PEFC Poland Office shall organise public consultation on the draft version and ensure that:</p> <p>e) the public consultation lasted at least 60 days”</p>



PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
	Process	YES	<i>The public consultation lasted 64 days (from 25 November 2021 until 28 January 2022).</i>
(f) all feedback is considered by the working group in an objective manner, and	Procedures	YES	PEFC PL 1001:2021 “5.6 The PEFC Poland Office shall organise public consultation on the draft version and ensure that: f) all feedback received was considered by the working group in an objective manner”
	Process	YES	<i>An overview is found of comments received, and their consideration by the working group.</i>
(g) a synopsis of feedback is compiled for each material issue, including the outcome of considering the issue. ¹⁶ The synopsis is made publicly available (e.g. on a website) and is sent to each stakeholder/party that gave feedback.	Procedures	YES	PEFC PL 1001:2021 “5.6 The PEFC Poland Office shall organise public consultation on the draft version and ensure that: g) a summary of the comments received on substantive issues (with <i>information</i> on their inclusion or rejection) was publicly available, e.g. on the website, and was sent to each stakeholder who provided feedback.”
	Process	NO	<i>A synopsis was found of feedback received from stakeholders during the public consultation period. The list of comments received, together with the decisions of the working group, was posted on the PEFC Poland website. However, it was not sent to each stakeholder that gave feedback.</i>
6.5.2 For new standards the standardising body shall organise a second round of public consultation lasting at least 30 days.	Procedures	YES	PEFC PL 1001:2021 “5.6 (...) For new standards the PEFC Poland shall organise a second round of public consultation lasting at least 30 days.”
	Process	N.A.	<i>No new standard was developed.</i>
6.6 The standardising body shall organise pilot testing of new	Procedures	YES	PEFC PL 1001:2021 “5.6 (...) The PEFC Poland 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.”
	Process	N.A.	<i>No new standard was developed.</i>

¹⁶ 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.



PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
standard(s) ¹⁷ to assess the clarity, auditability and feasibility of the requirements. The working group shall consider the outcome of pilot testing.			
Approval and Publication			
7.1 The standardising body shall approve the standard(s)/normative document(s) formally when there is evidence of consensus among the working group.	Procedures	YES	PEFC PL 1001:2021 “5.7 The final version of the document, developed through consensus by the Working Group, shall be formally approved as a standard by the PEFC Poland Council by voting.” <i>Observation: It is remarkable that the procedures still require a voting by members of the PEFC Poland Council, even when consensus is reached in the working group. Technically this means that the PEFC Poland Council could overrule consensus reached by stakeholders.</i>
	Process	YES	Email informing the PEFC Poland Council of the results of the working group's vote (May 2, 2022) “The working group for the amendment of the Polish PEFC forest management certification system has completed its work and adopted the final version of the documents in an online vote. Twelve persons entitled to vote took part in the voting: 11 persons voted for their acceptance, 1 person abstained from voting. Thus, the working group recommends these documents for formal adoption by the PEFC Polska Council, in accordance with PEFC PL 1001:2021 Standard setting procedures. Attached are the final versions of the documents and the voting form. Please, cast your vote by May 10 inclusive” Explanation provided by PEFC Poland: “(the PEFC Council) Voted electronically. See the pdf file Voting of PEFC Poland Council and the Word file Voting form- PEFC Poland Council.” Development report:

¹⁷ NOTE Pilot testing is not required for revision of an existing standard when experience from its usage can substitute for pilot testing.



PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>"On 10 May 2022, the PEFC Poland Council formally adopted the final version of the forest management standards through an online vote:</p> <p>* PEFC PL 1003:2022 – Sustainable forest management – Requirements,</p> <p>* PEFC 1004: 2022 – Group forest certification."</p> <p><i>The email invitation to the PEFC Council members to officially approve the standard, includes the evidence that consensus has been reached among the working group members. Subsequently, the PEFC Poland Council voted for the official approval of the standard in accordance with its own procedures. Evidence was found of the filled in voting forms of 35 members of the PEFC Poland council, in which 32 members voted for the approval of the standard, and 3 members abstained from voting. This resulted in the formal approval of the standard by the Council on 10 May 2022.</i></p>
7.2.1 The formally approved standard(s)/normative document(s) shall be published and made publicly available at no cost within 14 days of approval, or as otherwise defined by the standardising body.	Procedures	YES	<p>PEFC PL 1001:2021</p> <p>"5.7.1 The formally approved standard shall be published on the PEFC Poland website within 14 days of approval."</p>
	Process	YES	<p><i>The approved document was published at the website of PEFC Poland on May 10, 2022, which is within 14 days of approval (May 10th).</i></p>
7.2.2 Standard(s) shall include:			
(a) identification and contact information for the standardising body,	Procedures	YES	<p>PEFC PL 1001:2021</p> <p>"5.7.6 The standard shall include:</p> <p>- the identity and contact details of the body setting the standard"</p>
	Process	YES	<p>PEFC PL 1003ver2EN:2023 (Cover page)</p> <p>"PEFC Poland Sękocin Stary, ul. Braci Leśnej 3 05-090 Raszyn Tel: 22 71 50 661, 22 71 50 344 Fax: 22 71 50 313</p>



PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			E-mail: pefc@ibles.waw.pl , Website: www.pefc.pl "
(b) official language of the standard,	Procedures	YES	PEFC PL 1001:2021 "5.7.6 The standard shall include: - the official language of the standard"
	Process	YES	PEFC PL 1003ver2EN:2023 "Copyright notice (...) The only official version of this document is the Polish version."
(c) a note that when there is inconsistency between versions, the English version of the standard as endorsed by the PEFC Council is the reference.	Procedures	YES	PEFC PL 1001:2021 "5.7.6 The standard shall include: - a note that when there is inconsistency between versions, the English version of the standard as endorsed by the PEFC Council is the reference."
	Process	YES	PEFC PL 1003ver2EN:2023 "Copyright notice (...) When there is inconsistency between versions, the English version of the standard as endorsed by the PEFC Council is the reference."
(d) The approval date and the date of next periodic review ¹⁸	Procedures	YES	PEFC PL 1001:2021 "5.7.6 The standard shall include: - the date of approval and the date of next periodic review."
	Process	YES	PEFC PL 1003ver2EN:2023 (Title page) "Approved by: PEFC Poland Date: 10.05.2022 (...) Date of next periodic review: 9.05.2027"
7.2.3 Printed copies shall be made available upon request at a price that covers no more than administrative costs (if any)	Procedures	YES	PEFC PL 1001:2021 "5.7.8 Printed copies shall be made available upon request at no cost."
	Process	YES	<i>PEFC Poland refers to the clause in PEFC PL 1001:2021 as their reference for the coming years.</i>

¹⁸ NOTE The date of next periodic review may be within a shorter period than five years based on (for example) stakeholder expectations or other foreseen developments.



PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
7.2.4 The standardising body shall make the development report (refer to PEFC GD 1007) publicly available	Procedures	YES	PEFC PL 1001:2021 “6.1 In order to ensure transparency and public availability, all adopted drafts and documents approved by the PEFC Poland Board shall be published on the PEFC Poland website within four weeks of formal approval. The same applies to the report on the amendment process (...)”
	Process	YES	<i>The development report was found on the website of PEFC Poland.</i>
Periodic review of standards			
8.1 The standard(s)/normative document(s) shall be reviewed at intervals that do not exceed a five-year period. The review shall be based on consideration of feedback received during the standard’s implementation and a gap analysis. If necessary, a stakeholder consultation shall be organised to obtain further feedback and input.	Procedures	YES	PEFC PL 1001:2021 “5.2.1 The process of establishing/revising the standard shall begin within five years of the last approval of the Polish PEFC scheme by PEFC International. 5.2.2 To start the revision process, it is necessary to review the existing standards. This is done through stakeholder feedback and a gap analysis, which examines the consistency of the Polish PEFC standards with the latest international PEFC standards published by the PEFC Council in Geneva, national laws and regulations, and other relevant standards to identify potential gaps in the standard. The latest scientific knowledge, research and relevant emerging issues shall also be considered. 5.2.4 Based on the feedback received during the period of a standard’s implementation, the outcome of the gap analysis and the consultations, the PEFC Poland shall decide whether to reaffirm the standard or whether a revision of the standard is necessary.”
	Process	NO	Explanation provided by PEFC Poland “PEFC Int at the 2019 General Assembly reported that for several national schemes the review should start by the end of 2019. Hence, such a review has been initiated in Poland and formally announced at the General Assembly of PEFC Poland in December 2019. The review collected just over 200 comments. A list of these is given in the file: Summary of comments made in the review. Their discussion was devoted to the first four meetings of the working group.” <i>The review date of the SFM standard was on 14 November 2019. The current revision process started with a decision of PEFC Poland on 19 December 2019, which is a month later than the review date. It shall be noted that no official review process was conducted, a normal revision was aimed for.</i> <i>Next, no evidence was found that the review of the standard was based on a gap analysis.</i>
	Procedures	YES	PEFC PL 1001:2021



PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
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. ¹⁹			"5.1.12 The PEFC Poland 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 PEFC Poland with clear directions for providing feedback."
	Process	NO	<i>No evidence was found that PEFC Poland has established a permanent mechanism for collecting and recording feedback on a standard, which is expected to be available on their website.</i>
8.2.2 All feedback received through all channels, including meetings, training courses, etc. shall be recorded and considered.	Procedures	YES	PEFC PL 1001:2021 "5.1.12 (...) All feedback received through all channels, including meetings, training courses, etc. shall be recorded and considered."
	Process	NO	<i>No evidence was provided on how PEFC Poland will record and consider all feedback received through all channels.</i>
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	Procedures	YES	PEFC PL 1001:2021 "5.2.2 To start the revision process, it is necessary to review the existing standards. This is done through stakeholder feedback and a gap analysis, which examines the consistency of the Polish PEFC standards with the latest international PEFC standards published by the PEFC Council in Geneva, national laws and regulations, and other relevant standards to identify potential gaps in the standard."
	Process	NO	Development Report "1. Introduction

¹⁹ NOTE Feedback can be sent in various formats: comments, requests for clarification and/or interpretation, complaints, etc.



PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
other relevant standards to identify potential gaps in the standard.			<p>(...) The start of the second revision was formally announced at the General Assembly of PEFC Poland in December 2019. There were two reasons for this decision:</p> <ul style="list-style-type: none"> - the publication of updated versions of the PEFC ST 1001, PEFC 1002 and PEFC 1003 standards by the PEFC Council and therefore the need to adapt the national standards; - the need for cyclic review/updating of the Polish system. <p>In addition in February 2020 PEFC Council published three revised standards related to chain of custody certification - PEFC ST 2001, PEFC St 2002 and PEFC 2003 - which in turn necessitated the update of procedures used by PEFC Poland: notification and licensing of PEFC trademarks. This meant in practice that all PEFC system documents in Poland needed to be revised."</p> <p><i>Although a general conclusion was drawn that the standards had to be revised, no gap analysis was found, which would have identified potential gaps in the standard.</i></p>
8.3.2 The standardising body shall consider the latest scientific knowledge, research and relevant emerging issues.	Procedures	YES	<p>PEFC PL 1001:2021</p> <p>"5.2.2 (...) The latest scientific knowledge, research and relevant emerging issues shall also be considered."</p>
	Process	YES	<p>Additional explanation provided by PEFC Poland</p> <p>"The comments and submissions were mainly made by foresters with a Master's degree (second tertiary education). Two forestry faculty members, both with doctoral degrees in forestry, were present in the working group. In addition, the PEFC system in Poland is administered by the Forest Research Institute."</p>
8.4.1 Where the feedback and the gap analysis do not identify a need to revise the standard, the standardising body shall organise stakeholder consultation to determine whether stakeholders see a need for revising the standard. The standardising body shall	Procedures	YES	<p>PEFC PL 1001:2021</p> <p>"5.2.3 Where the feedback and the gap analysis do not identify a need to revise the standard, the PEFC Poland shall organise stakeholder consultation to determine whether stakeholders see a need for revising the standard. The PEFC Poland shall include the gap analysis in the stakeholder consultation."</p>
	Process	N.A.	<p><i>No review of the standard was conducted, instead a full revision of the standards was conducted.</i></p>



PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
include the gap analysis in the stakeholder consultation.			
8.4.2 At the start of a review, the standardising body shall update the stakeholder identification mapping (refer to clause 6.2).	Procedures	YES	PEFC PL 1001:2021 "5.2.3 (...) At the start of a review, the PEFC Poland shall update the stakeholder identification mapping."
	Process	N.A.	<i>No review of the standard was conducted, instead a full revision of the standards was conducted, in which the updating of the stakeholder identification mapping was done, see requirement 6.2.</i>
8.4.3 The standardising body shall organise:			
(a) a public consultation period of at least 30 days (following the requirements of clause 6.5.1) and/or,	Procedures	YES	PEFC PL 1001:2021 "5.2.3 (...) The PEFC Poland shall organise: a) a public consultation period of at least 30 days (following the requirements of clause 5.6 and or,"
	Process	N.A.	<i>No review of the standard was conducted, instead a full revision of the standards was conducted.</i>
(b) stakeholder meetings.	Procedures	YES	PEFC PL 1001:2021 "5.2.3 (...) The PEFC Poland shall organise: b) stakeholder meetings"
	Process	N.A.	<i>No review of the standard was conducted, instead a full revision of the standards was conducted.</i>
8.4.4 The standardising body shall announce the review in a timely manner (refer to 6.3).	Procedures	YES	PEFC PL 1001:2021 "5.2.3 (...) The PEFC Poland shall announce the review in a timely manner."
	Process	N.A.	<i>No review of the standard was conducted, instead a full revision of the standards was conducted.</i>
8.5.1 Based on the feedback received during the period of a standard's implementation, the outcome of the gap	Procedures	YES	PEFC PL 1001:2021 "5.2.4 Based on the feedback received during the period of a standard's implementation, the outcome of the gap analysis and the consultations, the PEFC Poland shall decide whether to reaffirm the standard or whether a revision of the standard is necessary."
	Process	N.A.	<i>No review of the standard was conducted, instead a full revision of the standards was conducted.</i>



PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
analysis and the consultations, the standardising body shall decide whether to reaffirm the standard or whether a revision of the standard is necessary.			
8.5.2 The decision shall be made at the highest decision-making level of the standardising body	Procedures	YES	PEFC PL 1001:2021 “5.2.4 The decision shall be made at the highest decision-making level of the PEFC Poland.”
	Process	YES	<i>The decision to start the review process of PEFC Poland's documentation and roadmap was taken by the General Assembly of PEFC Poland on 19 December 2019. One year later, on 18 December 2020, the General Assembly of PEFC Poland officially launched the revision process.</i>
8.5.3 Where the decision is to reaffirm a standard, the standardising body shall provide a justification for the decision and make the justification publicly available.	Procedures	YES	PEFC PL 1001:2021 “5.2.4 Where the decision is to reaffirm a standard, the PEFC Poland shall provide a justification for the decision and make the justification publicly available.”
	Process	N.A.	<i>No standard was not reaffirmed, instead a full revision of the standards was conducted.</i>
8.5.4 Where the decision is to revise the standard, the standardising body shall specify the type of revision (normal or editorial revision).	Procedures	YES	PEFC PL 1001:2021 “5.2.4 Where the decision is to revise the standard, the PEFC Poland shall specify the type of revision (normal or editorial revision).”
	Process	YES	<i>On 18 December 2020, the General Assembly of PEFC Poland officially launched the revision process. At the time it was not evident to conduct an editorial revision due to the many changes in the PEFC benchmark standard.</i>
Revision of standards			
	Procedures	YES	PEFC PL 1001:2021



PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
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.			<p>“1 This document defines requirements for the process of establishing and revising a forest management standard in Poland. These procedures shall be followed in connection with the development of new standards and during the five-yearly revisions within the Polish system.</p> <p>5.2.1 The process of establishing/revising the standard shall begin within five years of the last approval of the Polish PEFC scheme by PEFC International.”</p>
	Process	YES	<i>The revision took place at the periodic review and did not include editorial revisions and time-critical revisions. The revision process followed the procedures for standard revision.</i>
9.2 Editorial revisions can be made without triggering the normal revision process. The standardising body shall approve the editorial changes formally and publish an amendment or a new edition of the standard.	Procedures	YES	<p>PEFC PL 1001:2021</p> <p>“5.2.5 Editorial revisions can be made without triggering the normal revision process. The PEFC Poland shall approve the editorial changes formally and publish an amendment or a new edition of the standard.”</p>
	Process	N.A.	<i>No editorial revision was conducted, instead, a normal revision process was conducted.</i>
9.3.1 A time-critical revision is a revision between two periodic reviews using a fast-track process.	Procedures	YES	<p>PEFC PL 1001:2021</p> <p>“5.2.6 A time-critical revision is a revision between two periodic reviews using a fast-track process”</p>
	Process	N.A.	<i>No time critical revision was conducted, instead, a normal revision process was conducted.</i>
9.3.2 A time-critical revision can be conducted only in the following situations:			
	Procedures	YES	PEFC PL 1001:2021



PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
(a) Change in national laws and regulations affecting compliance with PEFC International requirements			"5.2.6 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"
	Process	N.A.	<i>No time critical revision was conducted, instead, a normal revision process was conducted.</i>
(b) Instruction by PEFC International to comply with specific or new PEFC requirements within a timescale that is too short for a normal revision.	Procedures	YES	PEFC PL 1001:2021 "5.2.6 b) Instruction by PEFC International to comply with specific or new PEFC requirements within a timescale that is too short for a normal revision."
	Process	N.A.	<i>No time critical revision was conducted, instead, a normal revision process was conducted.</i>
9.3.3 The time-critical revision shall follow these steps:			
(a) The standardising body shall draft the revised standard,	Procedures	YES	PEFC PL 1001:2021 "5.2.6 (...) The time-critical revision shall follow these steps: a) The PEFC Poland shall draft the revised standard"
	Process	N.A.	<i>No time critical revision was conducted, instead, a normal revision process was conducted.</i>
(b) The standardising body may consult stakeholders, but it is not mandatory,	Procedures	YES	PEFC PL 1001:2021 "5.2.6 (...) b) The PEFC Poland may consult stakeholders, but it is not mandatory"
	Process	N.A.	<i>No time critical revision was conducted, instead, a normal revision process was conducted.</i>
(c) The revised standard shall be approved formally at the highest appropriate decision-making level of the standardising body,	Procedures	YES	PEFC PL 1001:2021 "5.2.6 (...) c) The revised standard shall be approved formally at the highest appropriate decision-making level of the PEFC Poland"
	Process	N.A.	<i>No time critical revision was conducted, instead, a normal revision process was conducted.</i>
	Procedures	YES	PEFC PL 1001:2021



PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
(d) The standardising body shall explain the justification for the urgent change(s) and make the justification publicly available.			"5.2.6 (...) d) The PEFC Poland shall explain the justification for the urgent change(s) and make the justification publicly available"
	Process	N.A.	<i>No time critical revision was conducted, instead, a normal revision process was conducted.</i>
9.4.1 A revision shall define the application date and transition period of the revised standard(s)/normative document(s).	Procedures	YES	PEFC PL 1001:2021 "5.7.4 Revised documents shall have an application date and transition periods."
	Process	YES	PEFC PL 1003ver2EN:2023 " Application date: 9.05.2023 Transition date: 9.05.2024 "
9.4.2 An application date shall not be more than one year after the publication of the standard. This allows time for endorsement of the revised standard(s)/normative document(s), introduction of change(s), information dissemination and training.	Procedures	YES	PEFC PL 1001:2021 "5.7.4 Revised documents shall have an application date and transition periods. The application date shall be no later than one year after the publication of the new standards."
	Process	YES	PEFC PL 1003ver2EN:2023 "Date of publication: 10.05.2022 Application date: 9.05.2023 " <i>The application date is not more than one year after the publication of the standard.</i>
9.4.3 The transition period shall not exceed one year. The standardising body may determine a longer period when justified by	Procedures	YES	PEFC PL 1001:2021 "5.7.5 The transition period shall not exceed one year. Exceptions are allowed in justified special circumstances where more time is needed to implement the revised standards."
	Process	YES	PEFC PL 1003ver2EN:2023 "Application date: 9.05.2023



PEFC Conformity Assessment of the Polish Forest Certification System

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
exceptional circumstances.			Transition date: 9.05.2024 " <i>The transition period does not exceed one year.</i>

Part II: PEFC Checklist for Group Forest Management Certification

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

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
4. Context of the group organisation		
4.1 Understanding the group organisation and its context		
The standard shall define how relevant external and internal issues of the group organisation shall be determined. A general framework for the group organisation shall be determined:		
a) regional groups: group of forest owners/managers defined by regional borders and	N.A.	<i>PFCS does not specify the option for regional groups, instead has general requirements for groups (see next).</i>
b) other groups and/or	YES	PEFC EN 1004ver2:2023 “1. Scope This document sets out the general requirements for forest certification schemes, including group forest management certification, which allows multiple forest owners/managers to be certified under a single certificate. Group forest management certification requires the establishment of a specific governance structure that takes into account individual forest owners/managers. This entity is the representative of the individual owners/managers in the forest certification process and ensures that the sustainable forest management standard is properly implemented and provides an appropriate level of certainty during random sampling for certification activities.”
c) whether there are any other specific circumstances which influence the implementation of the group management system.	N.A.	<i>No other specific circumstances are formulated which could influence the implementation of the group management system.</i>
4.2 Understanding the needs and expectations of affected stakeholders		
4.2.1 The standard requires that the group organisation shall identify:		
a) the affected stakeholders that are relevant for the group management system and	YES	PEFC EN 1004ver2:2023 “4.1.1. (...) The group organisation shall identify: a) the affected stakeholders that are relevant for the group management system”



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
b) the relevant expectations of these affected stakeholders.	YES	PEFC EN 1004ver2:2023 "4.1.1. (...) b) the relevant expectations of these affected stakeholders."
4.3 Determining the scope of the group management system		
4.3.1 The standard shall provide definitions relating to the following terms, which are in conformity with the definitions of those terms presented in chapter 3:		
a) the group organisation and the elements of the group organisation (group entity and participant),	YES	PEFC EN 1004ver2:2023 "3.7 Group entity The entity that represents the participants and has overall responsibility for ensuring that forest management in the certified area complies with the SFM standard and other applicable requirements of the forest certification scheme. The group entity uses a group management system for this purpose. 3.12 Group organisation A group of participants represented by a group entity for the purposes of implementing and certifying the SFM standard. There shall be a binding written agreement between the participant and the group entity. The term "group organisation" is equivalent to "regional" if the group falls within the boundaries of a region, or to other terms used in the forest certification scheme in question, provided it is consistent with the definition set out above. 3.16 Participant Forest owner/manager or other entity covered by a group forest certificate, with rights to manage the forest in a clearly defined area, and the ability to implement the requirements of the SFM standard in the area. Note: The term "ability to implement the requirements of the Sustainable Forest Management Standard" requires the entity to have long-term forest management rights, which prevents temporary owners from participating in group certification."
b) the certified area,	YES	PEFC EN 1004ver2:2023 "3.3 Certified area Forest area under group forest certification, representing the sum of forest areas submitted for certification, belonging to the participants."
c) the group certificate and	YES	PEFC EN 1004ver2:2023



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>"3.8 Group forest certificate</p> <p>A document confirming that the group organisation complies with the requirements of the sustainable forest management standard and other relevant requirements of the forest certification scheme."</p>
d) the document confirming participation in group certification.	YES	<p>PEFC EN 1004ver2:2023</p> <p>"3.5. Document confirming participation in the group forestry certification</p> <p>A document issued to the participant, relating to the group forestry certification, confirming that the participant is within the scope of the group forestry certification."</p>
4.3.2 The standard requires that for the establishment of the scope for the group management system the boundaries and applicability of the group management system shall be determined.	YES	<p>PEFC EN 1004ver2:2023</p> <p>"4.1.4. The group management system shall ensure and facilitate the implementation of PEFC standards for sustainable forest management at the group level.</p> <p>4.2. General requirements for a group entity</p> <p>4.2.1. The group entity shall provide a commitment to:</p> <ul style="list-style-type: none"> a) adherence to the standard of sustainable forest management and other applicable requirements of the certification scheme; b) integrate the requirements of group certification into the group management system; c) continuous improvement of the group management system; d) the continuous promotion of improvements in sustainable land/forest management by the participants"
4.3.3 The standard shall define which requirements of the sustainable forest management standard may be fulfilled on group level.	NO	<p>PEFC EN 1004ver2:2023</p> <p>"4.2.1. The group entity shall provide a commitment to:</p> <ul style="list-style-type: none"> a) adherence to the standard of sustainable forest management and other applicable requirements of the certification scheme. <p>4.3. Role and responsibilities of the group entity</p> <ul style="list-style-type: none"> c) Commitment on behalf of the entire group organisation to comply with the requirements of the Sustainable Forest Management Standard and other relevant requirements of the Polish PEFC forest certification scheme. d) shall define which requirements of the sustainable forest management standard may be fulfilled on group level."

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<i>Clause 4.3 d does define that the group entity shall define which requirements may be fulfilled on group level. This is not in line with the PEFC benchmark. It shall be noted this shall be defined in the standard.</i>
4.3.4 The standard requires that the scope shall be made available as documented information.	YES	PEFC EN 1004ver2:2023 “4.3. (...) Requirements for the functions and responsibilities of the group entity shall include: h) Documentation: • the scope of the group management system shall be made available as documented information,”
4.4 Group management system		
4.4.1 The standard requires that all participants shall be subject to the internal monitoring and the internal audit programme.	YES	PEFC EN 1004ver2:2023 “4.7.1.1. An ongoing internal monitoring program shall provide assurance that the group organization’s activities comply with the SFM standard. 4.7.2.1.2. The internal audit programme shall cover the group entity and all group participants. The group entity shall be audited on an annual basis. Participants for the audit may be selected on a sample basis.”
4.4.2 The standard requires that a certified PEFC chain of custody system shall be in place if a group entity acts as a trader of forest based material not covered by group certificate.	YES	PEFC EN 1004ver2:2023 “4.2.4. If the group delegation acts as a trader of forest material not covered by group certification, it shall implement a PEFC-certified supply chain system.”
5. Leadership		
5.1 Organisational roles, responsibilities and authorities		
5.1.1 Functions and responsibilities of the group entity		
The standard requires that the following functions and responsibilities of the group entity shall be specified:		
a) to implement and maintain an effective management system covering all participants of the group;	YES	PEFC EN 1004ver2:2023 “4.3. Role and responsibilities of the group entity a) implementing and maintaining an effective management system involving all the participants in the group.”
b) to represent the group organisation in the certification process, including in communications and	YES	PEFC EN 1004ver2:2023



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
relationships with the certification body, submission of an application for certification, and contractual relationship with the certification body;		"b) Represent the group organisation during the certification process, also in terms of communication and relations with the certification body, submission of the certification application and conclusion of the agreement with the certification body."
c) to establish written procedures for the management of the group organisation;	YES	PEFC EN 1004ver2:2023 "d) Establish written procedures for the management of the group organisation"
d) to establish written procedures for the acceptance of new participants of the group organisation. These acceptance procedures shall cover at least the verification of the applicant's information about contact details, clear identification of their forest property and its/their size(s)	YES	PEFC EN 1004ver2:2023 "e) Establishing written procedures for the admission of new members to the group organisation. These procedures shall include at least verification of the contact details given by the applicant and clear identification of the forest area claimed for certification and its size."
e) to establish written procedures for the suspension and exclusion of participants who do not correct/close nonconformities. Group participants excluded from any certification group based on nonconformities cannot be accepted within 12 months after exclusion	YES	PEFC EN 1004ver2:2023 "f) the establishment of written procedures for the suspension and debarment of participants who do not rectify/remove non-conformities. Participants excluded from a group organisation due to non-compliance may not apply for admission to the group organisation for a period of 12 months following the exclusion."
f) to keep documented information of: i. the group entity and participants' conformity with the requirements of the sustainable forest management standard, and other applicable requirements of the forest certification system, ii. all participants, including their contact details, identification of their forest property and its/their size(s), iii. the certified area, iv. the implementation of an internal monitoring programme, its review and any preventive and/or corrective actions taken;	YES	PEFC EN 1004ver2:2023 "g) Documentation: • compliance of the group entity and participants with the standard of sustainable forest management and other requirements of the Polish forestry certification scheme PEFC, • all participants, including their contact details, their forest areas and their surface, • certified area, • the implementation of an internal monitoring programme, its reviews and any preventive and/or corrective action taken. • Implementation of corrective actions. Documented information relevant to the management of the group or compliance with the forest management standard shall be kept up to date, available for use when needed and protected against loss of confidentiality, misuse or loss of integrity."

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
<p>g) to establish connections with all participants based on a binding written agreement which shall include the participants' commitment to comply with the sustainable forest management standard. The group entity shall have a written contract or other written agreement with all participants covering the right of the group entity to implement and enforce any corrective or preventive measures, and to initiate the exclusion of any participant from the scope of certification in the event of nonconformity with the sustainable forest management standard;</p> <p>Note: The requirements for "participant' commitment" and "written contract or other written agreement with all participants" may also be satisfied by the commitment of and written agreement of a pre-existing organisation or group or the members participation, such as a forest owners'/managers' association, SFM programme and submission to tax programming, where the organisation can demonstrate that it has a legal mandate to represent the participants and where its commitment and the terms and conditions of the contract are enforceable.</p>	YES	<p>PEFC EN 1004ver2:2023</p> <p>"h) Establish a relationship with all participants based on a written agreement that includes a commitment by participants to comply with the requirements of the SFM standard. The group entity shall enter into a written agreement or contract with all participants. The document shall record the right of the group entity to implement and enforce any corrective or preventive actions and to initiate the procedure for exclusion of a participant from the scope of the certificate in the event of non-compliance with the sustainable forest management standard. Note: The requirements for "commitment of participants" and "written agreement or contract with all participants" can be met in the form of a commitment recorded in a written agreement with an association of forest owners/managers, as long as the association demonstrates that it can legally represent the participants and the terms of the agreement are enforceable by law."</p>
<p>h) to provide all participants with a document confirming participation in the group forest certification;</p>	YES	<p>PEFC EN 1004ver2:2023</p> <p>"i) Sending participants the documents confirming their participation in the group forestry certification. The validity of the confirmation of participation issued to the group members begins with the signature of the voluntary commitment and continues until the end of the validity of the group certificate."</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>	YES	<p>PEFC EN 1004ver2:2023</p> <p>"j) Provide all participants with the information and guidance necessary to successfully implement the Sustainable Forest Management Standard and other requirements of the Polish PEFC forestry certification scheme."</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
j) to address nonconformities reported from group members which were identified under other PEFC certifications than the particular group certification and to ensure implementation with all group members;	YES	PEFC EN 1004ver2:2023 “l) Addressing non-conformities reported by group members identified in PEFC certifications other than a specific group certification and ensuring that they are addressed by all group members.”
k) to operate an internal monitoring programme that provides for the evaluation of the participants’ conformity with the certification requirements;	YES	PEFC EN 1004ver2:2023 “k) Management of an internal monitoring programme to assess compliance of participants' activities with certification requirements.”
l) to operate an annual internal audit programme covering both group members and group entity;	YES	PEFC EN 1004ver2:2023 “m) the introduction of an annual internal audit programme involving both group participants and the group entity.”
m) to operate a management review of the group forest certification and acting on the results from the review;	YES	PEFC EN 1004ver2:2023 “n) conducting management reviews as part of the group forestry certification and acting on the results of these reviews.”
n) to provide full co-operation and assistance in responding effectively to all requests from the certification body, accreditation body, PEFC International or the National Governing Body for relevant data, documentation or other information; allowing access to the forest area covered by the group organisation and other facilities, whether in connection with formal audits or reviews or otherwise related or with implications for the management system.	YES	PEFC EN 1004ver2:2023 “p) ensuring full cooperation and assistance in responding effectively to any requests from the certification body, accreditation body, PEFC International or the national management unit for access to relevant data, documents and other information; allowing access to the forest area and facilities of the group organisation, whether for formal audits or reviews or for other management system-related matters.”
5.1.2 Function and responsibilities of participants The standard requires that the following functions and responsibilities of the participants shall be specified:		
a) To provide the group entity with a binding written agreement, including a commitment on conformity with the sustainable forest management standard and other applicable requirements of the forest certification system; group participants excluded from	YES	PEFC EN 1004ver2:2023 “4.4. Role and responsibilities of participants a) Entering into a written agreement with the group entity that includes a commitment to comply with the Sustainable Forest Management Standard or other relevant requirements of the Polish PEFC forest

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
any certification group cannot apply for group membership within 12 months after exclusion. Note: The requirement for “written agreement” and participants’ “commitment” is also satisfied by the commitment of and written agreement of a pre-existing organisation or group or the members participation, such as a forest owners’/managers’ association, SFM programme and submission to tax programming, where the organisation can demonstrate that it has a legal mandate to represent the participants and where its commitment and the terms and conditions of the contract are enforceable.		certification scheme; Participants excluded from the group organization due to non-compliance may not apply for admission to the group organization for a period of 12 months following exclusion. Note: The 'written agreement' and 'commitment' requirement can also be met by a commitment and written agreement from a pre-existing organisation or group or participating body, such as a forest owners/managers association, a sustainable forest management programme, if the organisation can demonstrate that it has the right to represent its members and can enforce its commitment and the terms of the agreement.”
b) To provide the group entity with information about previous group participation.	YES	PEFC EN 1004ver2:2023 “b) Providing the group entity with information on participation in previous groups.”
c) to comply with the sustainable forest management standard and other applicable requirements of the certification system as well as with the requirements of the management system;	YES	PEFC EN 1004ver2:2023 “a) Entering into a written agreement with the group entity that includes a commitment to comply with the management system, c) compliance to the sustainable forest management standard and other requirements of the Polish forest management certification scheme PEFC.”
d) to provide full co-operation and assistance in responding effectively to all requests from the group entity, or certification body for relevant data, documentation or other information; allowing access to the forest and other facilities, whether in connection with formal audits or reviews or otherwise related or with implications for the management system;	YES	PEFC EN 1004ver2:2023 “d) full cooperation and assistance with any request from a group entity or control body for data, documentation or other information. e) allowing access to the forest area and other facilities, as part of a formal audit, review or other management system matter;”
e) to inform the group entity about nonconformities identified under other PEFC certifications than the particular group certification.	YES	PEFC EN 1004ver2:2023 “f) informing the group entity of any non-compliance identified in PEFC certifications other than the group certification in question.”



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
f) to implement relevant corrective and preventive actions established by the group entity.	YES	PEFC EN 1004ver2:2023 “g) implementation of corrective and preventive actions determined by the group entity.”
5.2 Commitment and policy		
5.2.1 The standard requires that the group entity shall provide a commitment:		
a) to comply with the sustainable forest management standard and other applicable requirements of the certification system;	YES	PEFC EN 1004ver2:2023 “4.2.1. The group entity shall provide a commitment to: a) comply to the standard of sustainable forest management and other applicable requirements of the certification scheme.”
b) to integrate the group certification requirements in the group management system;	YES	PEFC EN 1004ver2:2023 “4.2.1. The group entity shall provide a commitment to: b) integrate the requirements of group certification into the group management system.”
c) to continuously improve the group management system;	YES	PEFC EN 1004ver2:2023 “4.2.1. The group entity shall provide a commitment to: c) continuous improvement of the group management system.”
d) to continuously support the improvement of the sustainable management of the land/forests by the participants.	YES	PEFC EN 1004ver2:2023 “4.2.1. The group entity shall provide a commitment to: d) the continuous promotion of improvements in sustainable land/forest management by the participants.”
5.2.2 The commitment of the group entity may be part of a group management policy and shall be publicly available as documented information upon request.	YES	PEFC EN 1004ver2:2023 “4.2.1. (...) The commitment of the group entity may be part of a group management policy and shall be publicly available as documented information upon request.”
5.2.3 The standard requires that the participants shall provide a commitment		
a) to follow the rules of the management system;	YES	PEFC EN 1004ver2:2023 “4.4. Role and responsibilities of participants

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		a) Entering into a written agreement with the group entity that includes a commitment to comply with the management system, Sustainable Forest Management Standard and other relevant requirements of the Polish PEFC forest certification scheme.”
b) to implement the requirements of the sustainability standard in their operations in their area.	YES	PEFC EN 1004ver2:2023 “4.4. Role and responsibilities of participants a) Entering into a written agreement with the group entity that includes a commitment to comply with the (...) Sustainable Forest Management Standard and other relevant requirements of the Polish PEFC forest certification scheme.”
6. Planning		
6.1 The standard requires that if a group organisation plans any changes in the group management system, these changes shall be included in a group management plan.	YES	PEFC EN 1004ver2:2023 “4.5. Planning If the group organisation plans to make changes to the group management system, these changes shall be made to the group management plan.”
6.2 The standard requires that if a group organisation decides to fulfil requirements of the sustainable forest management standard on the group level, these requirements shall be considered in a group management plan.	YES	PEFC EN 1004ver2:2023 “4.5. Planning Where a group organisation decides to meet the requirements of the Sustainable Forest Management Standard at group level, these requirements shall be incorporated into the group management plan.”
7. Support		
7.1 The standard requires that resources needed for the establishment, implementation, maintenance and continual improvement of the group management system shall be determined and provided.	YES	PEFC EN 1004ver2:2023 “4.1.4. The group management system shall ensure and facilitate the implementation of PEFC standards for sustainable forest management at the group level. Resources shall be provided to establish, implement, maintain and continually improve group governance.”
7.2 The standard shall define the necessary competence of persons doing work in the group management system.	YES	PEFC EN 1004ver2:2023 “4.1.5. Persons carrying out work under the management system shall have appropriate training and knowledge of the sustainable forest management standard, group certification requirements and other standards, laws and technological issues, if required to perform the work.”
7.3 The standard requires that communication processes shall be in place to raise the awareness of participants concerning:		



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
a) the group management policy;	YES	PEFC EN 1004ver2:2023 “4.1.6. Communication processes shall be used to raise awareness among group participants of: a) group management policies.”
b) the requirements of the sustainable forest management standard;	YES	PEFC EN 1004ver2:2023 “b) requirements of the standard for sustainable forest management.”
c) their contribution to the effectiveness of the group management system and the sustainable forest management, including the benefits of improved group performance;	YES	PEFC EN 1004ver2:2023 “c) their contribution to the effectiveness of the group's governance system and sustainable forest management, including the benefits of improving the group's performance.”
d) the implications of not conforming with the group management system requirements.	YES	PEFC EN 1004ver2:2023 “d) the consequences of failure to comply with the requirements of the group management system.”
7.4 The standard requires that the internal and external communications relevant to the group management system shall be determined. This includes:		
a) on what to communicate;	YES	PEFC EN 1004ver2:2023 “4.1.7. Internal and external communication regarding the group management system shall be defined. This includes: what (...) to communicate.”
b) when to communicate;	YES	PEFC EN 1004ver2:2023 “4.1.7. (...) This includes: when, (...) to communicate.”
c) with whom to communicate;	YES	PEFC EN 1004ver2:2023 “4.1.7. (...) This includes: to whom (...) to communicate.”
d) how to communicate.	YES	PEFC EN 1004ver2:2023 “4.1.7. (...) This includes: (...) how to communicate.”
7.5 The standard requires that appropriate mechanisms shall be in place for resolving complaints and disputes relating to group management and sustainable forest management operations.	YES	PEFC EN 1004ver2:2023 “4.2.5. The group organization shall establish a mechanism for handling complaints and appeals related to the implementation of the requirements of the Group Forest Certification Standard (PEFC PL 1004) and the Sustainable Forest Management Standard (PEFC PL 1003).”

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
7.6 The standard requires that the documented information relevant to the group management system and the conformance with the requirements of the sustainable forest management standard is:		
a) up to date;	YES	PEFC EN 1004ver2:2023 “4.3. Role and responsibilities of the group entity Documented information relevant to the management of the group or compliance with the forest management standard shall be kept up to date.”
b) available and suitable for use, where and when it is needed;	YES	PEFC EN 1004ver2:2023 “4.3. (...) Documented information relevant to the management of the group or compliance with the forest management standard shall be (...) available for use when needed.”
c) adequately protected against loss of confidentiality, improper use, or loss of integrity.	YES	PEFC EN 1004ver2:2023 “4.3. (...) Documented information relevant to the management of the group or compliance with the forest management standard shall be (...) protected against loss of confidentiality, misuse or loss of integrity.”
8. Operation		
8.1 The standard requires that the group organisation shall plan, implement and control processes needed:		
a) to meet the requirements of the group certification standard and the sustainable forest management standard and	YES	PEFC EN 1004ver2:2023 “4.6.1. The group organisation shall plan, implement and control the processes necessary to: a) compliance with the requirements of the Group Forest Certification standard and the Sustainable Forest Management standard.”
b) to implement the actions determined in 6.	YES	PEFC EN 1004ver2:2023 “4.6.1. The group organisation shall plan, implement and control the processes necessary to: b) implementation of the actions listed in Chapter 4.5.”
8.2 The standard requires that this planning, implementing and controlling shall be done by:		
a) defining the necessary processes and establishing criteria for those;	YES	PEFC EN 1004ver2:2023 “4.6.2. Planning, implementation and control are carried out through: a) defining the necessary processes and establishing criteria for them.”



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;	YES	PEFC EN 1004ver2:2023 “b) implementing process controls 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.	YES	PEFC EN 1004ver2:2023 “c) maintaining the documented information necessary to obtain assurance that the processes have been performed according to plan.”
9. Performance evaluation		
9.1 Monitoring, measurement, analysis and evaluation		
9.1.1 The standard requires that an ongoing internal monitoring programme provides confidence in the conformity of the group organisation with the sustainable forest management standard. In particular, it shall be determined:		
a) what shall be monitored and measured;	YES	PEFC EN 1004ver2:2023 “4.7.1.1. An ongoing internal monitoring program shall provide assurance that the group organization's activities comply with the SFM standard. In particular, it shall establish: a) what is to be monitored and measured”
b) the methods for monitoring, measurement, analysis and evaluation, as applicable, to ensure valid results;	YES	PEFC EN 1004ver2:2023 “b) monitoring, measurement, analysis and evaluation methods, as appropriate, to ensure reliable results.”
c) when the monitoring and measuring shall be performed;	YES	PEFC EN 1004ver2:2023 “c) when to monitor and take measurements.”
d) when the results from monitoring and measurement shall be analysed and evaluated;	YES	PEFC EN 1004ver2:2023 “d) when to analyse and evaluate the results of monitoring and measurement.”
e) what documented information shall be available as evidence of the results.	YES	PEFC EN 1004ver2:2023 “e) what documented information is to be available as evidence of achievement of the objectives.”
9.1.2 The standard requires that the group entity shall evaluate the group management performance and the effectiveness of the group management system concerning the implementation of the sustainable forest management requirements.	YES	PEFC EN 1004ver2:2023 “4.7.1.2. The group entity shall evaluate the effects of group management and the effectiveness of the group management system in implementing the requirements of sustainable forest management.”



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
9.2 Internal audit		
9.2.1 Objectives		
9.2.1.1 The standard requires that an annual internal audit programme shall provide information on whether the group management system:		
a) conforms to i. the group organisation's own requirements for its group management system; ii. the requirements of the national group certification standard;	YES	PEFC EN 1004ver2:2023 "4.7.2.1.1. The annual internal audit programme developed by the group entity shall provide information on whether the group management system: a) complies with the group organisation's own requirements for the group management system and with the requirements of the national group certification standard."
b) ensures the implementation of the sustainable forest management standard on the participant level;	YES	PEFC EN 1004ver2:2023 "b) ensure implementation of the SFM standard at the participant level."
c) is effectively implemented and maintained.	YES	PEFC EN 1004ver2:2023 "d) has been effectively implemented and is effectively maintained."
9.2.1.2 The standard requires that the internal audit programme shall cover the group entity and all group participants. The group entity shall be audited annually. The participants may be selected on a sample basis.	YES	PEFC EN 1004ver2:2023 "4.7.2.1.2. The internal audit programme shall cover the group entity and all group participants. The group entity shall be audited on an annual basis. Participants for the audit may be selected on a sample basis."
9.2.2 Organisation		
The standard requires an internal audit programme which shall cover at least:		
a) planning, establishing, implementing and maintaining an audit programme(s) including the frequency, methods, responsibilities, planning requirements and reporting, which shall take into consideration the importance of the processes concerned and the results of previous audits;	YES	PEFC EN 1004ver2:2023 "4.7.2.2. Organisation of internal audit The internal audit programme shall include at least: a) planning, establishing, implementing and maintaining the audit programme, including frequency, methods, responsibilities, planning and reporting requirements, taking into account the importance of these processes and the results of previous audits."
b) definition of the audit criteria and scope for each audit;	YES	PEFC EN 1004ver2:2023 "b) definition of criteria and scope of each audit."



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
c) competence of internal auditor (forest knowledge, standard knowledge);	YES	PEFC EN 1004ver2:2023 “c) definition of the competence of the internal auditor (knowledge of the forest, knowledge of the standard).”
d) selection of auditors and conducting of audits to ensure objectivity and the impartiality of the audit process;	YES	PEFC EN 1004ver2:2023 “d) selection of auditors and conduct of audits so as to ensure the objectivity and impartiality of the audit process.”
e) ensuring that the results of the audits are reported to relevant group management;	YES	PEFC EN 1004ver2:2023 “e) ensuring that the results of audits are communicated to the management of the group.”
f) retaining of the documented information as evidence of the implementation of the audit programme and the audit results.	YES	PEFC EN 1004ver2:2023 “f) keeping documented information as evidence of the implementation of the audit programme and its results.”
9.3 Selection of participants in the internal audit programme		
9.3.1 General		
9.3.1.1 The standard requires the establishment of requirements for the selection of participants in the internal audit programme. These requirements shall include the following procedures for:		
a) determination of the sample size (9.3.2);	YES	PEFC EN 1004ver2:2023 “4.7.3.1. General provisions Requirements shall be established for the selection of participants in the internal audit programme. These requirements shall include the following procedures: a) the determination of sample size.”
b) determination of sample categories (9.3.3);	YES	PEFC EN 1004ver2:2023 “b) the determination of sample categories.”
c) distribution of the sample to the categories (9.3.4);	YES	PEFC EN 1004ver2:2023 “c) distribution of samples to categories.”
d) selection of the participants (9.3.5).	YES	PEFC EN 1004ver2:2023 “d) selection of participants.”



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
9.3.1.2 The standard may define additional requirements on the regional, national or sub-national level.	N.A.	<i>No additional requirements are defined in the standard.</i>
9.3.1.3 The standard shall define additional sampling requirements in case of participation of pre-existing organisations or group or the members participation, such as a forest owners'/managers' association, SFM programme and submission to tax programming which have their own members.	YES	PEFC EN 1004ver2:2023 "4.7.3.1. General provisions Requirements shall be established for the selection of participants in the internal audit programme. These requirements shall include the following procedures: a) the determination of sample size." <i>In the Polish forestry context such situations are not likely to occur, as groups are organised in regions and do not contain sub-groups. Such additional sampling requirements are therefore not developed.</i>
9.3.2 Determination of the sample size		
9.3.2.1 The sample size shall be calculated for the participants of the group organisation.	YES	PEFC EN 1004ver2:2023 "4.7.3.2.1. The sample size shall be calculated for participants in a group organisation."
9.3.2.2 The size of the sample generally should be the square root of the number of participants: ($y=\sqrt{x}$), rounded to the upper whole number.	YES	PEFC EN 1004ver2:2023 "4.7.3.2.2. The sample size shall be the square root of the number of participants ($y=\sqrt{x}$), rounded up to a whole number."
9.3.2.3 The size of the sample may be adapted by a standard taking into account one or more of the following indicators:		
a) results of a risk assessment. In this case deviations of sample sizes in case of low or high risk for individual categories shall be defined;	N.A.	<i>PEFC EN 1004ver2:2023 does not allow any sample size adaptation.</i>
b) results of internal audits or previous certification audits;	N.A.	<i>PEFC EN 1004ver2:2023 does not allow any sample size adaptation.</i>
c) quality / level of confidence of the internal monitoring programme;	N.A.	<i>PEFC EN 1004ver2:2023 does not allow any sample size adaptation.</i>
d) use of technologies allowing the gathering of information concerning specified requirements;	N.A.	<i>PEFC EN 1004ver2:2023 does not allow any sample size adaptation.</i>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
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.		
e) based on other means of gathering information about activities on the ground. Note: One way could be a survey with participants who provide some information about their activities on the ground.	N.A.	<i>PEFC EN 1004ver2:2023 does not allow any sample size adaptation.</i>
9.3.3 Determination of sample categories		
9.3.3.1 The sample categories shall be established based on the results of a risk assessment. The indicators used in the risk assessment shall reflect the geographical scope of the standard. The following non exhaustive list of indicators may be used for the risk assessment:		
a) ownership type (e.g. state forest, communal forest, private forest);	YES	PEFC EN 1004ver2:2023 “4.7.3.3.1. The test categories shall be established on the basis of the results of the risk assessment. The indicators used for risk assessment shall relate to the area to be certified. The following list of indicators can be adapted/used for risk assessment: a) form of ownership (e.g. state, communal, private forest).”
b) size of management units (different size classes);	YES	PEFC EN 1004ver2:2023 “b) the size of the units managed (by size class).”
c) biogeographic region (e.g. lowlands, low mountain range, high mountain range);	YES	PEFC EN 1004ver2:2023 “c) biogeographical region (e.g. lowland, low mountain range, high mountain range)”
d) operations, processes and products of potential group participants;	YES	PEFC EN 1004ver2:2023 “d) activities, processes and products of potential participants in the group.”
e) deforestation and forest conversion;	YES	PEFC EN 1004ver2:2023 “e) deforestation and conversion of forests.”
f) rotation period(s);	YES	PEFC EN 1004ver2:2023 “f) the adopted felling ages and the applied felling techniques.”



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
g) richness of biological diversity;	YES	PEFC EN 1004ver2:2023 “g) rich biodiversity.”
h) recreation and other socio-economic functions of the forest;	YES	PEFC EN 1004ver2:2023 “h) recreational and other socioeconomic functions of forests.”
i) dependence of and interaction with local communities and indigenous people;	YES	PEFC EN 1004ver2:2023 “i) dependence on and interaction with local communities.”
j) available resources for administration, operations, training and research;	YES	PEFC EN 1004ver2:2023 “j) available resources for administration, operation, training and research.”
k) governance and law enforcement.	YES	PEFC EN 1004ver2:2023 “k) order and enforcement.”
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.	YES	PEFC EN 1004ver2:2023 “4.7.3.3.2. The conditions that constitute the risk for each indicator at low, medium and high levels and the corresponding consequences for sampling shall be identified.”
9.3.4 Distribution of the sample The sample shall be distributed to the categories according to the result of the risk assessment.	YES	PEFC EN 1004ver2:2023 “4.7.3.4. Distribution of the sample The sample shall be categorised according to the outcome of the risk assessment.”
9.3.5 Selection of the participants		
9.3.5.1 At least 25% of the sample should be selected at random.	YES	PEFC EN 1004ver2:2023 “4.7.3.5. Selection of participants At least 25% of the sample shall be selected randomly.”
9.3.5.2 A risk-based procedure for the selection of the participants shall be specified.	YES	PEFC EN 1004ver2:2023 “4.7.3.5. (...) For the remaining participants, a risk-based selection procedure shall be defined.”
9.4 Management review		
9.4.1 The standard requires that an annual management review shall at least include:		

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
a) the status of actions from previous management reviews;	YES	PEFC EN 1004ver2:2023 “4.7.4.1. The annual management review shall include as a minimum: a) the status of activities since the previous reviews.”
b) changes in external and internal issues that are relevant to the group management system;	YES	PEFC EN 1004ver2:2023 “b) developments in internal and external matters 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;	YES	PEFC EN 1004ver2:2023 “c) compliance of management with the sustainable forest management standard, which shall include a review of the results of the internal monitoring programme, internal audit and assessments and supervision by the certification body.”
d) information on the group performance, including trends in: i. nonconformities and corrective actions; ii. monitoring and measurement results; iii. audit results;	YES	PEFC EN 1004ver2:2023 “d) information on the performance of the group organisation, including trends: i. non-compliance and corrective action; ii. the results of monitoring and measurement; iii. the results of the audit.”
e) opportunities for continual improvement.	YES	PEFC EN 1004ver2:2023 “e) opportunities for continuous improvement.”
9.4.2 The standard requires that the outputs of the management review shall include decisions related to continual improvement opportunities and any need for changes to the group management system.	YES	PEFC EN 1004ver2:2023 “4.7.4.2. The results of the management system assessment shall include decisions on opportunities for continuous improvement and the need for any changes to the group management system.”
9.4.3 The standard requires that the group organisation shall retain documented information as evidence of the results of management reviews.	YES	PEFC EN 1004ver2:2023 “4.7.4.3. The group organisation shall keep documented information as evidence of the results of management reviews.”
10. Improvement		
10.1 Non conformity and corrective action		
10.1.1 The standard requires when a nonconformity occurs, the group organisation shall:		



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
a) react to the nonconformity and, as applicable: i. take action to control and correct it; ii. deal with the consequences;	YES	PEFC EN 1004ver2:2023 “5.1.1. In the event of non-compliance, the group organisation shall: a) respond to non-compliance and as appropriate: i. take steps to control and correct it; ii. deal with the consequences.”
b) evaluate the need for action to eliminate the causes of the nonconformity, in order that it does not recur or occur elsewhere, by: i. reviewing the nonconformity; ii. determining the causes of the nonconformity; iii. determining if similar nonconformities exist, or could potentially occur;	YES	PEFC EN 1004ver2:2023 “(b) assess the need for action to eliminate the causes of the non-compliance so that it does not recur or occur elsewhere, by: i. overview of non-compliance; ii. identifying its causes; iii. determining whether similar non-compliances exist or are likely to occur.”
c) implement any action needed;	YES	PEFC EN 1004ver2:2023 “(c) implement the necessary actions.”
d) review the effectiveness of any corrective action taken;	YES	PEFC EN 1004ver2:2023 “(d) review the effectiveness of corrective action taken.”
e) make changes to the group management system, if necessary.	YES	PEFC EN 1004ver2:2023 “(e) if necessary, make the necessary changes to the group management system.”
10.1.2 The standard requires that the group organisation shall retain documented information as evidence of:		
a) the nature of the nonconformities and any subsequent actions taken;	YES	PEFC EN 1004ver2:2023 “5.1.3. The group organisation shall keep documented information as evidence: a) the nature of the non-compliance and the action taken as a result.”
b) the results of any corrective action.	YES	PEFC EN 1004ver2:2023 “b) the results of corrective actions.”
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	YES	PEFC EN 1004ver2:2023



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
allowed to re-enter the group certification. The internal audit shall not take place sooner than 12 months after the exclusion.		"5.1.4. A participant excluded from group certification shall undergo an internal audit by the group entity before being allowed to rejoin the group organisation. The internal audit shall take place no earlier than 12 months after exclusion."
10.2 Continual improvement The standard requires that the suitability, adequacy and effectiveness of the group management system and the sustainable management of the forest shall be continuously improved.	YES	PEFC EN 1004ver2:2023 "5.2 Continuous improvement Sustainable forest management and group management system shall be continuously improved according to PEFC PL 1003 and PEFC PL 1004."



Part III: PEFC Checklist for Sustainable Forest Management

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

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
Context of the national standard and the organisations applying a PEFC endorsed standard		
4.1 General		
The requirements for sustainable forest management defined by regional, national or sub-national forest management standards shall:		
a) include management and performance requirements that are applicable at the forest management unit level, or at another level as appropriate, to ensure that the intent of all requirements is achieved at the forest management unit level; Note: An example of a situation where a requirement can be defined as being at another level (e.g. group/regional) is monitoring of forest health. Through monitoring of forest health at regional level, and communicating of results at the FMU level, the objective of the requirement is met without the necessity to carry out the individual monitoring of each forest management unit.	YES	PEFC PL 1003ver2EN:2023 “1. Introduction These requirements form the basis for assessing the condition of forest management for all forms of forest ownership in the certification process by an independent certification body under the PEFC scheme and include defined certification criteria for both individual forest areas and the regional level.” <i>The forest management standard includes requirements that are applicable at the forest management unit level.</i>
b) be clear, performance based and auditable;	YES	PEFC PL 1003ver2EN:2023 “3. Scope, terms and definitions Additional indicators marked with letters: A, B, C, etc. are a possibility to specify forest management objectives within a specific area under assessment, based on knowledge of experts (certification bodies and certified bodies).” <i>The requirements of the forest management standard are clear, performance based and auditable.</i> <i>Observation: It shall be noted that the additional indicators (A, B, C, etc) are not mandatory, but provide options for indicators to be used by auditors, and in that sense (partially) provides further interpretation of the requirement, which is a strength of the Scheme. However, it also has a weakness: the indicator lists</i>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<i>are generally not complete in the sense that they often do not fully cover the requirement and therefore might unintentionally give the impression that the listed indicators should be sufficient (whereas they are not). Since it is specified in chapter 3 that these indicators are a possibility, it is concluded to be a weakness rather than a non-conformity.</i>
c) apply to activities of all forest operators in the defined forest area who have an impact on achieving compliance with the requirements;	YES	<p>PEFC PL 1003ver2EN:2023</p> <p>“3. Scope, terms and definitions</p> <p>These requirements (criteria) for sustainable forest management apply to forests of all ownership forms. (...) The forest owner or manager undertakes to manage the forest in accordance with these requirements.</p> <p>The forest owner or manager shall also make reasonable efforts to ensure that they are respected in all contractual obligations to which it is a signatory and which relate to its forest management in the certified area.”</p>
d) require record-keeping that provides evidence of compliance with the requirements of the forest management standards;	YES	<p>PEFC PL 1003ver2EN:2023</p> <p>“1. Introduction</p> <p>(...) These requirements (...) include defined certification criteria for both individual forest areas and the regional level.</p> <p>Annex 3: Individual forest Certification</p> <p>1.1 (...) The requirements for sustainable forest management defined by national forest management standards shall:</p> <p>a) require record-keeping that provides evidence of compliance with the requirements of the forest management standards;”</p> <p>PEFC EN 1004ver2:2023</p> <p>“4.3. Role and responsibilities of the group entity</p> <p>g) Documentation (...) Documented information relevant to the management of the group or compliance with the forest management standard shall be kept up to date, available for use when needed and protected against loss of confidentiality, misuse or loss of integrity.”</p>
e) specify “100% PEFC certified”, or another system specific claim, as claim to be used to communicate the	YES	<p>PEFC PL 1003ver2EN:2023</p> <p>“Annex 3: Individual forest Certification</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
<p>origin of products in an area covered by the standard to customers with a PEFC chain of custody;</p> <p>Note: System specific claims of PEFC endorsed standards and PEFC Council approved abbreviations of such claims and the claim “100% PEFC certified”, and their translations into languages other than English, are published online on the PEFC website www.pefc.org.</p>		<p>1.1 (...) The requirements for sustainable forest management defined by national forest management standards shall:</p> <p>b) specify “100% PEFC certified”, or another system specific claim, as claim to be used to communicate the origin of products in an area covered by the standard to customers with a PEFC chain of custody;</p> <p>Note: System specific claims of PEFC endorsed standards and PEFC Council approved abbreviations of such claims and the claim “100% PEFC certified”, and their translations into languages other than English, are published online on the PEFC website www.pefc.org.”</p> <p>PEFC EN 1004ver2:2023</p> <p>“4.4. Role and responsibilities of participants</p> <p>The requirements for participants in the group certification are as follows: h) declaring products sold from a certified forest area as PEFC certified, with the statement “100% certified by PEFC”, “100% PEFC” or “100% PEFC origin”.”</p>
<p>f) require that where owners/managers of forests are selling products from areas other than covered by the standard, only products from areas covered by the standard are sold with the claim “100% PEFC-certified” or a system specific claim;</p>	YES	<p>PEFC PL 1003ver2EN:2023</p> <p>“Annex 3: Individual forest Certification</p> <p>1.1 (...)</p> <p>The requirements for sustainable forest management defined by national forest management standards shall:</p> <p>c) 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;”</p> <p>PEFC EN 1004ver2:2023</p> <p>“4.4. Role and responsibilities of participants</p> <p>The requirements for participants in the group certification are as follows: h) declaring products sold from a certified forest area as PEFC certified, with the statement “100% certified by PEFC”, “100% PEFC” or “100% PEFC origin”.</p> <p>j) 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;”</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
g) require that claims on the origin of products in an area covered by the standard are only made by forest owners/managers covered by a PEFC recognised certificate issued against the standard;	YES	<p>PEFC PL 1003ver2EN:2023</p> <p>"Annex 3: Individual forest Certification</p> <p>1.1 (...) The requirements for sustainable forest management defined by national forest management standards shall:</p> <p>d) require that claims on the origin of products in an area covered by the standard are only made by forest owners/managers covered by a PEFC recognised certificate issued against the standard;"</p> <p>PEFC EN 1004ver2:2023</p> <p>"4.4. Role and responsibilities of participants</p> <p>i) claims on the origin of products in an area covered by the standard shall only be made by forest owners/managers covered by a PEFC recognised certificate issued against the standard;"</p>
h) specify requirements concerning the information which need to be provided to a PEFC chain of custody certified customer;	YES	<p>PEFC EN 1004ver2:2023</p> <p>"4.4. Role and responsibilities of participants</p> <p>The requirements for participants in the group certification are as follows:</p> <p>h) declaring products sold from a certified forest area as PEFC certified, with the statement "100% certified by PEFC", "100% PEFC" or "100% PEFC origin".</p> <p>k) specify requirements concerning the information which need to be provided to a PEFC chain of custody certified customer described in the standard PEFC ST 2002:2020 Chain of Custody of Forest and Tree Based Products – Requirements; according to the requirements of this standard, the organization shall provide the customer with documentation providing the following information for each delivery:</p> <ul style="list-style-type: none"> a. PEFC customer identification b. the organisation's name as the supplier of the material c. product identification d. quantity of product(s) e. date of delivery / delivery period / accounting period f. the applicable PEFC claim specifically for each claimed product covered by the documentation g. the certificate number of the organisation's PEFC recognised certificate" <p>PEFC PL 1003ver2EN:2023</p> <p>"Annex 3: Individual forest Certification</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>1.1 (...) e) specify requirements concerning the information which need to be provided to a PEFC chain of custody certified customer described in the standard PEFC ST 2002:2020 Chain of Custody of Forest and Tree Based Products – Requirements; according to the requirements of this standard, the organization shall provide the customer with documentation providing the following information for each delivery:</p> <p>a. PEFC customer identification</p> <p>b. the organisation's name as the supplier of the material</p> <p>c. product identification</p> <p>d. quantity of product(s)</p> <p>e. date of delivery / delivery period / accounting period</p> <p>f. the applicable PEFC claim specifically for each claimed product covered by the documentation</p> <p>g. the certificate number of the organisation's PEFC recognised certificate."</p>
i) include an overview of applicable legislation, if requirements of this benchmark are not reflected in the regional, national or sub-national standard, because they are already addressed through the legislation.	YES	<p>PEFC PL 1003ver2EN:2023</p> <p>"2. Basic documents</p> <p>The following requirements comply with the following acts in force in Poland: (...)</p> <p>Forest management shall take into account all applicable laws in Poland as well as international treaties and agreements to which Poland is a signatory and meet all requirements set by PEFC Poland.</p> <p>The forest owner or manager shall comply with all national and local laws related to forest management. It shall also pay all applicable and legally defined contributions, taxes and other fees in this regard.</p> <p>Acts of particular importance are the Forest Act, the Nature Conservation Act and the Environmental Protection Act (see chapter 2 Basic normative documents) with implementing acts."</p> <p><i>Chapter 2 of PEFC PL 1003ver2EN:2023 lists 53 acts, directives, conventions, instructions and manuals.</i></p>
4.2 Understanding the needs and expectations of affected stakeholders		
The standard requires that the organisation shall determine:		
a) the affected stakeholders that are relevant to the sustainable forest management;	YES	<p>PEFC PL 1003ver2EN:2023</p> <p>"4.6.10. Certified organisation shall determine:</p> <p>a) the affected stakeholders that are relevant to the sustainable forest management;"</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<i>Observation: it is noted that the same requirement is also included in Annex 3 clause 1.2, which is an exact duplication and therefore redundant.</i>
b) the relevant needs and expectations of these stakeholders.	YES	PEFC PL 1003ver2EN:2023 “b) the relevant needs and expectations of these stakeholders.” <i>Observation: it is noted that the same requirement is also included in Annex 3 clause 1.2, which is an exact duplication and therefore redundant.</i>
4.3 Determining the scope of the management system		
4.3.1 The standard requires that the organisation shall determine the boundaries and applicability of the management system to establish its scope.	YES	PEFC PL 1003ver2EN:2023 “Annex 3: Individual forest Certification 1.3 Determining the scope of the management system The organisation shall determine the boundaries and applicability of the management system to establish its scope.” PEFC EN 1004ver2:2023 “4.1.4. Group organisation shall determine the boundaries and applicability of the management system to establish its scope.”
4.3.2 The standard requires that forest management shall comprise the cycle of inventory and planning, implementation, monitoring and evaluation, and shall include an appropriate assessment of the social, environmental and economic impacts of forest management practices. This shall form a basis for a cycle of continuous improvement.	YES	PEFC PL 1003ver2EN:2023 “4.1.2. Forest management shall encompass a cycle of forest resource inventory and management action planning, implementation, monitoring and evaluation, and include assessment of their social, environmental and economic impact. This mechanism shall form the basis for continual improvement of the management process, which makes it possible to reduce or avoid the negative effects of the activities carried out.”
5. Leadership		
5.1 The standard requires that the organisation shall provide a commitment:		
a) to comply with the sustainable forest management standard and other applicable requirements of the certification system;	YES	PEFC PL 1003ver2EN:2023 “Annex 3: Individual forest Certification 2.1 The organisation shall provide a commitment:

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>a) to comply with the sustainable forest management standard and other applicable requirements of the certification system;"</p> <p>PEFC EN 1004ver2:2023</p> <p>"4.1.4. (...) The group management system shall ensure and facilitate the implementation of PEFC standards for sustainable forest management at the group level.</p> <p>4.2.1. The group entity shall provide a commitment to:</p> <p>a) comply to the standard of sustainable forest management and other applicable requirements of the certification scheme;</p> <p>b) integrate the requirements of group certification into the group management system;</p> <p>(...) The commitment of the group entity may be part of a group management policy and shall be publicly available as documented information upon request."</p>
b) to continuously improve the sustainable forest management system.	YES	<p>PEFC PL 1003ver2EN:2023</p> <p>"Annex 3: Individual forest Certification</p> <p>2.1 The organisation shall provide a commitment:</p> <p>b) to continuously improve the sustainable forest management system."</p> <p>PEFC EN 1004ver2:2023</p> <p>"5.2 (...) The certified organisation shall provide a commitment to continuously improve the sustainable forest management system."</p>
5.2 The standard requires that this commitment shall be publicly available.	YES	<p>PEFC PL 1003ver2EN:2023</p> <p>"Annex 3: Individual forest Certification</p> <p>2.2 This commitment shall be publicly available."</p> <p>PEFC EN 1004ver2:2023</p> <p>"5.2 Continuous improvement</p> <p>The certified organisation shall provide a commitment to continuously improve the sustainable forest management system. That this commitment shall be publicly available."</p>
5.3 The standard requires that responsibilities for sustainable forest management shall be clearly defined and assigned.	YES	<p>PEFC PL 1003ver2EN:2023</p> <p>"Annex 3: Individual forest Certification</p> <p>2.3 Responsibilities for sustainable forest management shall be clearly defined and assigned."</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>PEFC EN 1004ver2:2023</p> <p>“4.2.1. The group entity shall provide a commitment to:</p> <p>a) adherence to the standard of sustainable forest management and other applicable requirements of the certification scheme;</p> <p>b) integrate the requirements of group certification into the group management system;</p> <p>4.4. Role and responsibilities of participants</p> <p>The requirements for participants in the group certification are as follows:</p> <p>a) Entering into a written agreement with the group entity that includes a commitment to comply with the Sustainable Forest Management Standard or other relevant requirements of the Polish PEFC forest certification scheme;”</p>
6. Planning		
6.1 Actions to address risks and opportunities		
6.1.1 The standard requires that the organisation shall consider risks and opportunities concerning compliance with the requirements for sustainable forest management. Size and scale of the operations of the organisation shall be considered.	YES	<p>PEFC PL 1003ver2EN:2023</p> <p>“Annex 3: Individual forest Certification</p> <p>3. Planning</p> <p>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.”</p> <p>PEFC EN 1004ver2:2023</p> <p>“4.7.1.2. (...) The group entity 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.”</p>
6.1.2 The standard requires that inventory and mapping of forest resources shall be established and maintained, adequate to local and national conditions and in correspondence with the requirements described in this international benchmark standard.	YES	<p>PEFC PL 1003ver2EN:2023</p> <p>“4.1.2. Forest management shall encompass a cycle of forest resource inventory and management action planning, implementation, monitoring and evaluation, and include assessment of their social, environmental and economic impact. (...) An inventory of forest resources shall be carried out and its results mapped according to local or national conditions.”</p>
6.2 Management plan		



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
6.2.1 The standard requires that management plans shall be:		
a) elaborated and periodically updated or continually adjusted;	YES	<p>PEFC PL 1003ver2EN:2023</p> <p>“3.15 Management plan (with particular reference to the forest management plan or its equivalent) Documented information setting out the objectives, activities and control arrangements for the management of resources and ecosystem services over an agreed period of time.</p> <p>Note 1: Under Polish conditions the basic plan for sustainable forest management is the Forest Management Plan (FMP) or its statutory equivalent, e.g. simplified management plan (SMP).</p> <p>Note 2: The elements of the management plan also include annual management plans and other documents drawn up depending on the scale and scope of the needs to implement forest management.</p> <p>4.1.3. Forest management plans (or their equivalents) shall be developed and, where necessary, updated according to national legal requirements and taking into account available scientific research results.”</p> <p>Explanation provided by PEFC Poland related to the wording “where necessary, updated” in clause 4.1.3</p> <p>“These are emergency situations in which both the forest management plan and the management plan must be amended/corrected: natural disasters (floods, hurricanes) or hailstorms of harmful insects. Also problems with harmful plants, such as the parasitic mistletoe, which attacks many pine stands.”</p> <p>The forest management plan is updated regularly, in revision cycles, every ten years. The update includes, among other things, an analysis of the performance of tasks from the previous management period. Pursuant to the provisions of the Forest Act, a FMP may also be updated 'occasionally', e.g. in the event of a natural disaster. In such cases, an annex to the FMP is made. In connection with the recent preparation of conservation tasks for Natura 2000 areas within the framework of the FMP, the forest management plan is also sometimes annexed with these tasks.</p> <p>Legal basis: Forest Act: Article 23 (1) An amendment to a forest management plan or simplified management plan may be made by means of an annex, subject to paragraphs (2) and (4) and observing the provisions of Article 22 [paragraphs refer to the situation of increasing timber harvesting, and Article 22 is the procedures].</p> <p>Excerpt from the Forest Act</p> <p>Chapter 4 Forest management plan</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>Article 18. 1. A forest management plan shall be drawn up, subject to paragraph (2), for 10 years, taking into account:</p> <p>1) the natural and economic conditions of forest management;</p> <p>2) objectives and principles of forest management and methods of their implementation, defined for each stand and managed object, taking into account protective forests.</p> <p>2. In cases justified by the condition of forests, in particular by the occurrence of damage or natural disasters, the forest management plan may be prepared for periods shorter than 10 years.</p> <p>3. A change in the period referred to in paragraphs (1) and (2) shall require the consent of the body approving the forest management plan.”</p>
b) appropriate to the size and use of the forest area;	YES	<p>PEFC PL 1003ver2EN:2023</p> <p>“3.15 Management plan (with particular reference to the forest management plan or its equivalent) Documented information setting out the objectives, activities and control arrangements for the management of resources and ecosystem services over an agreed period of time.</p> <p>(...) Note 2: The elements of the management plan also include annual management plans and other documents drawn up depending on the scale and scope of the needs to implement forest management.</p> <p>4.1.3. Forest management plans (or their equivalents) shall be developed”</p>
c) based on applicable local, national and international legislation as well as existing land-use or other official plans; and	YES	<p>PEFC PL 1003ver2EN:2023</p> <p>“2. Basic documents</p> <p>(...) Forest management shall take into account all applicable laws in Poland as well as international treaties and agreements to which Poland is a signatory and meet all requirements set by PEFC Poland.</p> <p>The forest owner or manager shall comply with all national and local laws related to forest management. It shall also pay all applicable and legally defined contributions, taxes and other fees in this regard.</p> <p>Acts of particular importance are the Forest Act, the Nature Conservation Act and the Environmental Protection Act (see chapter 2 Basic normative documents) with implementing acts.</p> <p>3.15 Management plan (with particular reference to the forest management plan or its equivalent) Documented information setting out the objectives, activities and control arrangements for the management of resources and ecosystem services over an agreed period of time.</p>

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		Note 1: Under Polish conditions the basic plan for sustainable forest management is the Forest Management Plan (FMP) or its statutory equivalent, e.g. simplified management plan (SMP). 4.7.1. Forest management must comply with local, national and international legislation, in particular on: forest management rules; protection of nature and the environment; ownership, tenure and use rights of land by local people; health and safety at work; payment of dues and taxes."
d) adequately covering forest resources.	YES	PEFC PL 1003ver2EN:2023 "4.1.4. Forest management plans (or their equivalents) shall include at least: a description of the state of the forest at the date of the plan, long-term and mid-term objectives, allowable harvest and/or management areas for the duration of the plan."
6.2.2 The standard requires that management plans shall take into account the different uses or functions of the managed forest area.	YES	PEFC PL 1003ver2EN:2023 "4.3.3. Management plans shall take into account the different uses and functions of the forest area. Annex 1: Guidelines for interpretation of criteria for plantations (...) In the case of plantations, requirements (...) 4.3.3, (...) cannot be applied to individual stands and shall be considered at a higher (regional) level in terms of the whole management/administrative unit, where fast-growing stands are complemented by buffer zones and set-aside areas with their environmental, ecological, cultural and social functions. In order to enhance landscape value and biodiversity, water and soil conservation rules, the size and distribution of buffer strips and protected set-aside areas shall be defined at the preparatory stage of plantation establishment. Decisions shall be taken on the basis of social, environmental and ecological assessments, and these shall be reviewed in subsequent production cycles."
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.	YES	PEFC PL 1003ver2EN:2023 "4.1.4. Forest management plans (or their equivalents) shall include at least: a description of the state of the forest at the date of the plan, long-term and mid-term objectives, allowable harvest and/or management areas for the duration of the plan. 4.3.6. The level of planned use of forest timber and non-timber resources shall guarantee the long-term sustainable development of the area, and the harvested forest products shall be used optimally, ensuring the renewability of forest resources." Explanation provided by PEFC Poland



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>"For State Forests</p> <p>An management plan (financial and economic plan) is drawn up for each subsequent year. The annual preparation of the plan was regulated in the Regulation of the Council of Ministers of 6 December 1994 on detailed principles of financial management in the State Forests National Forest Holding.</p> <p>According to § 6.1 of the aforementioned regulation "the basis for financial management of State Forests organisational units are annual financial and economic plans, containing: 1) material tasks, 2) sales revenues, 3) costs of activity, 4) financial result."</p> <p>The plans are subject to approval according to the powers in the aforementioned regulation:</p> <p>§6. 2. The plans of the regional directorates, in addition to their own plan, include plans of the forest districts and plants, approved by the directors of the regional directorates.</p> <p>§6. 3. The financial and economic plan of the State Forests shall include the plan of the Directorate General and the plans of the regional directorates, approved by the Director General.</p> <p>Forest management is carried out according to the provisions of the forest management plan. This plan is drawn up for a period of 10 years and contains a description and assessment of the condition of the forest and the objectives, tasks and methods of forest management. The forest management plan is approved by the minister responsible for the environment.</p> <p>The general part of the forest management plan called elaborate or general description contains:</p> <ul style="list-style-type: none"> - general characteristics of forests and land to be afforested and other land and properties under the management of the Forest District; - Results of the analysis of forest management in the past period; - A description of the principles adopted for the definition of the management tasks of the district; - Description and summary of tasks (including wood harvest) resulting from the forest management plan; - The nature protection program; - Forecast of the timber resources at the end of the management period; - Summary of management activities. <p>Private forests</p> <p>For private forests, the provisions of the Forest Act also apply. Management activities in these forests are usually carried out on the basis of a simplified management plan or, in the case of very small forest</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		areas, on the basis of an inventory of the growing trees. The private forests are supervised by the district administrative offices. Arbitrary felling of trees by the forest owner is not legally possible.”
6.2.4 The standard requires that the annually allowable use of non-wood forest products shall be included in the management plan where forest management covers commercial use of non-wood forest products at a level which can have an impact on their long-term sustainability.	YES	PEFC PL 1003ver2EN:2023 “4.1.5. If forest management includes the commercial use of non-timber forest products, their annual use shall be included in the management plan. The stock of commercially utilized products shall be periodically reviewed 4.3.6. The level of planned use of forest timber and non-timber resources shall guarantee the long-term sustainable development of the area, and the harvested forest products shall be used optimally, ensuring the renewability of forest resources. The whole tree method (removal of all parts of the tree above and below the surface) shall not be used. The use of wood residues for energy purposes shall depend on the abundance of the habitat and its conservation needs.”
6.2.5 The standard requires that management plans specify ways and means to minimise the risk of degradation and damage to forest ecosystems.	YES	PEFC PL 1003ver2EN:2023 “4.2.4. Forest management plans shall identify ways and techniques of reducing the risk of degradation and damage to forest ecosystems”
6.2.6 The standard requires that management plans shall take into account the results of scientific research.	YES	PEFC PL 1003ver2EN:2023 “4.6 Criterion 6: Preservation of other socio-economic functions and conditions 4.6.15. Forest management shall also be based on the results of scientific research.”
6.2.7 The standard requires that a summary of the management plan, appropriate to the scope and scale of forest management, shall be publicly available and shall include information on the general objectives and forest management principles.	YES	PEFC PL 1003ver2EN:2023 “4.1.6. Management plans (or their equivalents) shall be publicly available excluding sensitive data and data likely to disturb the environment (e.g. stands of protected species).”
6.2.8 The standard requires that the publicly available summary of the management plan may exclude confidential business and personal information and other information made confidential by applicable legislation or for the protection of cultural sites or sensitive natural resource features.	YES	PEFC PL 1003ver2EN:2023 “4.1.6. (...) Note: Publicly available forest management plan data or its equivalent shall not include confidential business and personal information and other information that has been given confidential status under applicable laws or to protect cultural sites or sensitive natural resource elements.”

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
6.3 Compliance requirements		
6.3.1 Legal compliance		
<p>6.3.1.1 The standard requires that the organisation shall identify and have access to the legislation applicable to its forest management and determine how these compliance obligations apply to the organisation.</p> <p>Note: For a country which has signed a FLEGT Voluntary Partnership Agreement (VPA) between the European Union and the producing country, the “legislation applicable to forest management” is defined by the VPA agreement.</p>	YES	<p>PEFC PL 1003ver2EN:2023</p> <p>“2. Basic documents</p> <p>The following requirements comply with the following acts in force in Poland: (...) Forest management shall take into account all applicable laws in Poland as well as international treaties and agreements to which Poland is a signatory and meet all requirements set by PEFC Poland. The forest owner or manager shall comply with all national and local laws related to forest management. It shall also pay all applicable and legally defined contributions, taxes and other fees in this regard. (...) The forest owner or manager undertakes to manage the forest in accordance with these requirements.</p> <p>The forest owner or manager shall also make reasonable efforts to ensure that they are respected in all contractual obligations to which it is a signatory and which relate to its forest management in the certified area.</p> <p>4.7.1. Forest management must comply with local, national and international legislation, in particular on: forest management rules; protection of nature and the environment; ownership, tenure and use rights of land by local people; health and safety at work; payment of dues and taxes.”</p>
<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.</p>	YES	<p>PEFC PL 1003ver2EN:2023</p> <p>“2. Basic documents</p> <p>The following requirements comply with the following acts in force in Poland: (...) Forest management shall take into account all applicable laws in Poland as well as international treaties and agreements to which Poland is a signatory and meet all requirements set by PEFC Poland.</p> <p>The forest owner or manager shall comply with all national and local laws related to forest management. It shall also pay all applicable and legally defined contributions, taxes and other fees in this regard.</p> <p>4.7.1. Forest management must comply with local, national and international legislation, in particular on: forest management rules; protection of nature and the environment; ownership, tenure and use rights of land by local people; health and safety at work; payment of dues and taxes.”</p> <p><i>Chapter 2 includes acts, directives, conventions etc. applicable to forest management.</i></p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
6.3.1.3 The standard requires that where no anti-corruption legislation exists, the organisation must take alternative anti-corruption measures appropriate to the risk of corruption.	YES	Explanation provided by PEFC Poland "The most important legal act in this regard is the Penal Code, it sets responsibility for corruption in the public sector, in particular for bribery and the crime of paid patronage (the so-called trafficking in influence). Corruption offenses are, in particular, the acts just described in Article 228 of the Penal Code - the so-called passive bribery (selling out), which consists in accepting in connection with the performance of a public function a material or personal benefit or the mere promise of such a benefit. This is the most common corruption crime. Article 230 of the Criminal Code, on the other hand, speaks of paid passive patronage, that is, undertaking to act as an intermediary in arranging a matter in exchange for receiving an illegal benefit or its promise, while at the same time referring to the influence held by the person who is to receive the benefit (influence peddling) in a local or state government entity with public funds. Many other legal acts, of course, introduce obligations and provide for liability for fraud (including the Fiscal Penal Code, the Law on Prevention of Money Laundering and Financing of Terrorism, the Law on Responsibility for Violation of Public Finance Discipline), but the key regulations are those of the Criminal Code. (...) The Central Anti-Corruption Bureau (CBA) is a special service established to combat corruption in public and economic life, particularly in state and local government institutions, as well as to combat activities detrimental to the economic interests of the state. (...) It operates on the basis of the Act of June 9, 2006 on Central Bureau of Anticorruption. (...) The list of legal acts cited in the SFM standard (Chapter 2) includes: the Penal Code (11) and the Code of petty offences (13)."
6.3.1.4 The standard requires that measures shall be implemented to address protection of the forest from unauthorised activities such as illegal logging, illegal land use, illegally initiated fires, and other illegal activities.	YES	PEFC PL 1003ver2EN:2023 "4.7.2. The certified entity shall prevent theft of timber, poaching, illegal harvesting of timber and non-timber raw materials, illegal land use, arson and other illegal activities."
6.3.2 Legal, customary and traditional rights related to the forest land		
6.3.2.1 The standard requires that property rights, tree ownership and land tenure arrangements shall be clearly defined, documented and established for the relevant management unit. Likewise, legal, customary and traditional rights related to the forest land shall be clarified, recognised and respected.	YES	PEFC PL 1003ver2EN:2023 "4.6.3. Ownership and tenure of forest land shall be clearly defined, established and documented. Customs and traditions of forest use shall be respected to the extent consistent with applicable law."



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
Note: Guidance for the handling of tenure arrangements can be obtained from the FAO Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security.		
6.3.2.2 The standard requires that forest practices and operations shall be conducted in recognition of the established framework of legal, customary and traditional rights such as outlined in ILO 169 and the UN Declaration on the Rights of Indigenous Peoples, which shall not be infringed upon without the free, prior and informed consent of the holders of the rights, including the provision of compensation where applicable. Where the extent of rights is not yet resolved, or is in dispute, there are processes for just and fair resolution. In such cases forest managers shall, in the interim, provide meaningful opportunities for parties to be engaged in forest management decisions whilst respecting the processes and roles and responsibilities laid out in the policies and laws where the certification takes place.	N.A.	<i>It shall be noted that Poland does not have indigenous people groups.</i>
6.3.2.3 The standard requires that forest practices and operations shall respect human rights as defined by the Universal Declaration on Human Rights.	YES	PEFC PL 1003ver2EN:2023 "4.6.14. Forest management practices and activities shall respect human rights as defined in the Universal Declaration of Human Rights (UN 1948)."
6.3.3 Fundamental ILO conventions		
6.3.3.1 The standard requires that forest practices and operations shall comply with fundamental ILO conventions. Note: In countries where the fundamental ILO conventions have been ratified, the requirements of	YES	PEFC PL 1003ver2EN:2023 "4.6.13. Forest management must comply with the fundamental conventions of the International Labour Organisation"

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
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.		
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.	YES	PEFC PL 1003ver2EN:2023 “4.6.11. Forest operations shall be planned, organized and carried out in such a way that health risks and accident hazards are identified and all necessary measures can be taken to protect workers from risks related to their work. Workers shall be informed of the risks associated with their work and the possible preventive actions.”
6.3.4.2 The standard requires that working conditions shall be safe, and guidance and training in safe working practices shall be provided to all those assigned to a task in forest operations. Working hours and leave shall comply with national laws or applicable collective agreements. Note: Guidance for specifying national standards can be obtained from the ILO Code of Good Practice: Safety and Health in Forestry Work.	YES	PEFC PL 1003ver2EN:2023 “4.6.12. Working conditions shall be safe and all persons carrying out forestry work have been trained in health and safety. 4.6.16. Employees carrying out forestry work must have the necessary qualifications for their work. 4.7.1. Forest management must comply with local, national and international legislation, in particular on: (...) health and safety at work;” Explanation provided by PEFC Poland “All business entities operating in Poland, regardless of the form of ownership, are obliged to comply with the Labour Code. Article 129 [Length of working time]. § 1. Working time shall not exceed 8 hours per day and an average of 40 hours in an average five-day working week in an adopted settlement period not exceeding 4 months, subject to Articles 135-138, 143 and 144. Art. 135. § 1. If it is justified by the type of work or its organisation, an equivalent working time system may be applied, in which it is permissible to extend the daily working time, but not more than to 12 hours, in the settlement period not exceeding 1 month. The extended daily working time is compensated by a shorter daily working time on certain days or by days off.



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>Staff leave</p> <p>Chapter I</p> <p>Holidays</p> <p>Art. 152 § 1. An employee shall be entitled to an annual, uninterrupted, paid leave of absence, hereinafter referred to as "leave".</p> <p>§ 2. An employee may not resign from the right to leave.</p> <p>Art. 153 § 1. An employee taking up a job for the first time, in the calendar year in which he has started work, acquires the right to leave at the end of each month of work, in the amount of 1/12 of the leave to which he is entitled after having worked for a year.</p> <p>§ 2. The employee acquires the right to subsequent holidays in each subsequent calendar year.</p> <p>Art. 154 § 1. The length of leave is:</p> <p>1) 20 days - if the employee has been employed for less than 10 years;</p> <p>2) 26 days - if the employee has been employed for at least 10 years.</p> <p>§ 2. The length of leave for an employee employed on a part-time basis shall be established proportionally to the working time of that employee, taking as a basis the length of leave specified in § 1; an incomplete day of leave shall be rounded up to a full day."</p>
<p>6.3.4.3 The standard requires that wages of local and migrant forest workers as well as of contractors and other operators operating in PEFC-certified areas shall meet or exceed at least legal, industry minimum standards or, where applicable, collective bargaining agreements.</p> <p>Note: Where wages are below the living wage of a country, steps should be taken to attain increased wages towards a living wage level over time in addition to increases for inflation.</p>	YES	<p>PEFC PL 1003ver2EN:2023</p> <p>"4.6.18. Wages of employees performing forest management work in PEFC certified areas shall meet minimum legal and industry standards or, where applicable, collective bargaining agreements."</p> <p>Explanation provided by PEFC Poland</p> <p>"In the State Forests, employees are hired on the basis of an employment contract or contract of mandate. They are concluded taking into account the regulations of the aforementioned Labor Code, and it does not matter whether Polish citizens or foreigners are involved. It is not possible to work in the gray zone.</p> <p>However, it should be borne in mind that the vast majority of forestry operations are carried out by private companies, employed on the basis of contracts. Forest owners or managers do not have legal instruments to interfere in relations within these companies. They can only react if the work is carried out improperly or the worker performing it is not equipped with personal protective equipment.</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>All business entities operating in Poland, regardless of the form of ownership, are obliged to comply with this regulation.</p> <p>REGULATION OF THE COUNCIL OF MINISTERS (...) of 13 September 2022 on the amount of the minimum wage for work and the amount of the minimum hourly rate in 2023.</p> <p>Pursuant to Article 2(5) of the Act of 10 October 2002 on minimum remuneration for work (Dz. U. of 2020, item 2207) it is ordered as follows:</p> <p>§ 1. as of 1 January 2023, the minimum remuneration for work shall be established in the amount of PLN 3490.</p> <p>§ 2. as of 1 January 2023, a minimum hourly rate shall be established in the amount of PLN 22.80.</p> <p>§ 3. From 1 July 2023, a minimum wage is set at PLN 3600.</p> <p>§ 4. As of 1 July 2023, a minimum hourly rate shall be established in the amount of PLN 23.50.</p> <p>§ 5. The Regulation shall enter into force as of 1 January 2023.”</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.	YES	<p>PEFC PL 1003ver2EN:2023</p> <p>“4.6.19. The certified organisation shall ensure equality of opportunity, non-discrimination and a safe working environment. Gender equality must be promoted.”</p>
7. Support		
7.1 Resources		
7.1.1 The standard requires that the organisation shall determine and provide the resources needed for the establishment, implementation, maintenance and continual improvement of the sustainable forest management system.	YES	<p>PEFC EN 1004ver2:2023</p> <p>“4.1.4. (...) The group management system shall ensure and facilitate the implementation of PEFC standards for sustainable forest management at the group level. Resources shall be provided to establish, implement, maintain and continually improve group governance.”</p> <p>PEFC PL 1003ver2EN:2023</p> <p>“Annex 3: Individual forest Certification</p> <p>4. Resources</p> <p>The organisation shall determine and provide the resources needed for the establishment, implementation, maintenance and continual improvement of the sustainable forest management system.”</p>

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
7.2 Competence		
7.2.1 The standard requires that forest managers, contractors, employees and forest owners shall be provided with sufficient information and kept up-to-date through continuous training in relation to sustainable forest management, as a precondition for all management planning and practices described in this benchmark.	YES	<p>PEFC PL 1003ver2EN:2023</p> <p>“4.6.7. Forest owners and managers, forest administration staff and forest contractors shall have the knowledge and be motivated to continuously improve their knowledge through participation in training on sustainable forest management. This is a prerequisite for the proper planning and implementation of forest management activities described in this document.</p> <p>4.6.16. Employees carrying out forestry work must have the necessary qualifications for their work. Requirements for logging and skidding work are given in Annex 2.</p> <p>Annex 2: Requirements for logging and skidding.</p> <p>1. Possession of qualified personnel - trained saws and forestry machinery operators - confirmed by relevant certificates and attestations.”</p>
7.3 Communication		
7.3.1 The standard requires that effective communication and consultation with local communities, indigenous peoples and other stakeholders relating to sustainable forest management shall be provided.	YES	<p>PEFC PL 1003ver2EN:2023</p> <p>“4.6.9. FMU shall provide for education, communication and consultation with local communities and other stakeholders on sustainable forest management.”</p>
7.4 Complaints		
7.4.1 The standard requires that appropriate mechanisms are in place for resolving complaints and disputes relating to forest management operations, land use rights and work conditions.	YES	<p>PEFC PL 1003ver2EN:2023</p> <p>“4.6.9. (...) Mechanisms shall be in place to respond to complaints and to resolve forest management related disputes between forest managers and the local population.”</p> <p>Explanation provided by PEFC Poland</p> <p>“Within the State Forest organization, everything is regulated by the Labour Code. Poland has a State Labour Inspectorate, which conducts inspections, including emergency inspections. These matters are governed by the Labour Code - sample provisions below.</p> <p>Chapter III</p> <p>Labour Courts</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>Article 262. § 1. Disputes over claims arising from the employment relationship shall be resolved by common courts, known as "labour courts". (...)</p> <p>Liability for offences against employee rights</p> <p>Art. 281. § 1. Whoever, being an employer or acting on his behalf:</p> <p>1) enters into a civil law contract under conditions where, according to Article 22 § 1, an employment contract should have been entered into,</p> <p>1a) fails to notify the competent district labour inspector, in writing or electronically, of the conclusion of an employment contract referred to in Article 25 1 § 4 item 4, together with an indication of the reasons for the conclusion of such contract, within 5 working days of its conclusion,</p> <p>2) does not confirm in writing the employment contract concluded with the employee prior to his/her admission to work, (...)</p> <p>Art. 283. § 1. Whoever, being responsible for the state of health and safety at work or in charge of employees or other natural persons, fails to observe regulations or principles of occupational safety and health, shall be subject to a fine from PLN 1 000 to PLN 30 000.</p> <p>§ 2. The same penalty shall be imposed on anyone who:</p> <p>(...) 2) neglects, contrary to his duty, to ensure that the construction or reconstruction of a building or a part thereof, in which work premises are envisaged, is carried out on the basis of designs taking into account the requirements of occupational safety and health;</p> <p>3) contrary to the obligation, equips workplaces with machinery and other technical equipment that does not meet the requirements for conformity assessment;</p> <p>4) contrary to the obligation, provides the employee with personal protective equipment that does not meet the requirements for conformity assessment;</p> <p>5) against the obligation uses:</p> <p>(...) (c) hazardous substances, hazardous mixtures, hazardous substances or hazardous mixtures that do not have safety data sheets, as well as packaging protecting against their harmful effects, fire or explosion;</p> <p>6) fails, contrary to his duty, to notify the competent district labour inspector, the public prosecutor or any other competent authority of a fatal, serious or collective accident at work and of any other accident with the said consequences which is work-related if it can be considered an accident at work, fails to report an occupational disease or a suspicion of such a disease, fails to disclose an accident at</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		work or an occupational disease, or submits false information, evidence or documents concerning such accidents and diseases; 7) fails to comply with an enforceable order of an authority of the State Labour Inspectorate within the prescribed period;”
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.	NO	PEFC PL 1003ver2EN:2023 “3.15 Management plan (with particular reference to the forest management plan or its equivalent) Documented information setting out the objectives, activities and control arrangements for the management of resources and ecosystem services over an agreed period of time. 4.1.3. (...) Forest management plans (or their equivalents) shall be developed and, where necessary, updated according to national legal requirements and taking into account available scientific research results. 4.1.4. Forest management plans (or their equivalents) shall include at least: a description of the state of the forest at the date of the plan, long-term and mid-term objectives, allowable harvest and/or management areas for the duration of the plan.” <i>The reference only refers to the forest management plan. It is insufficiently ensured that the organisation’s management shall include (all) documented information required by the standard and determined by the organisation as being necessary for the effectiveness of the sustainable forest management system (e.g. standard operating procedures).</i>
7.5.2 The standard requires that the documented information is relevant, and updated as appropriate, to the activities of the organisation.	NO	PEFC PL 1003ver2EN:2023 “4.1.3. (...) Forest management plans (or their equivalents) shall be developed and, where necessary, updated according to national legal requirements and taking into account available scientific research results.” <i>The reference only refers to the management plan. It is insufficiently ensured that the requirement also applies to other documented information (which shall be relevant, and updated as appropriate, to activities of the organisation).</i>
8. Operation		
8.1 Criterion 1: Maintenance or appropriate enhancement of forest resources and their contribution to the global carbon cycle		

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
8.1.1 The standard requires that management shall aim to maintain or increase forests and their ecosystem services and maintain or enhance the economic, ecological, cultural and social values of forest resources.	YES	PEFC PL 1003ver2EN:2023 “4.1 (...) Forest management shall aim to maintain or enhance forests and their ecosystem services and to maintain or enhance the economic, ecological, cultural and social values of forest resources. 4.1.1. Forest management planning shall aim to maintain forest resources and enhance their quality in terms of the dominant forest functions. Annex 1: Guidelines for interpretation of criteria for plantations (...) In the case of plantations, requirements 4.1.1 (...) cannot be applied to individual stands and shall be considered at a higher (regional) level in terms of the whole management/administrative unit, where fast-growing stands are complemented by buffer zones and set-aside areas with their environmental, ecological, cultural and social functions. In order to enhance landscape value and biodiversity, water and soil conservation rules, the size and distribution of buffer strips and protected set-aside areas shall be defined at the preparatory stage of plantation establishment. Decisions shall be taken on the basis of social, environmental and ecological assessments, and these shall be reviewed in subsequent production cycles.”
8.1.2 The standard requires that the quantity and quality of the forest resources and the capacity of the forest to store and sequester carbon shall be safeguarded in the medium and long term by balancing harvesting and growth rates, using appropriate silvicultural measures and preferring techniques that minimise adverse impacts on forest resources.	YES	PEFC PL 1003ver2EN:2023 “4.1 (...) The quantity and quality of forest resources and the forest's capacity to capture and store carbon shall be safeguarded in the medium to long term by sustainable harvesting and tree growth rates and by favouring techniques that minimise the adverse impacts of human activities on forest resources.”
8.1.3 The standard requires that climate positive practices in management operations, such as greenhouse gas emission reductions and efficient use of resources shall be encouraged.	YES	PEFC PL 1003ver2EN:2023 “4.1 (...) Management actions shall promote climate-friendly practices, resulting in reduced greenhouse gas emissions and efficient use of resources.”
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	NO	PEFC PL 1003ver2EN:2023 “3.8 Forest



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
official authority including consultation with affected stakeholders; and		<p>Forest is land with a compact area of at least 0.10 ha, covered with forest vegetation (forest crops) - trees and bushes and undergrowth - or temporarily deprived of it, as well as land related to forest management.</p> <p>Note: The definition is based on the definition of forest in Article 3 of the Forest Act of 28 September 1991.</p> <p>3.9 Conversion of forest</p> <p>Human conversion of forest to another land use or plantation</p> <p>3.10 Plantation</p> <p>Area on which seedlings or seeds of fast-growing introduced or indigenous species have been planted, established for the purpose of producing as much timber or non-timber goods and services as possible within a shorter time cycle than in forest management</p> <p>4.1.10. Conversion of forests into other land use categories shall not take place unless there are reasonable circumstances in which conversion:</p> <p>is consistent with national or regional policies and laws on land use and forest management, and is the result of a national or regional land use plan developed by the government or other authorities, taking into account consultations with stakeholders affected by the standard (persons and organizations involved materially or directly) (...)</p> <p>A. Forest land area converted to other land use categories at the end of the year preceding the audit and each 3 years back (ha).</p> <p>Annex 1: Guidelines for interpretation of criteria for plantations (...)</p> <p>The requirement on "Conversion of forests to other land uses" means that plantations created by conversion after 31 December 2010 in circumstances other than "justified" do not meet this requirement and cannot be certified."</p> <p><i>Clause 4.1.10 only refers to conversion of forests to other land use-categories. However, based on the definition of "conversion of forest" in clause 3.9, it is concluded that clause 4.1.10 is also applicable to conversion of forest to plantation. As this is not specifically mentioned, it could be easily misinterpreted by standard users. Next, although the indicators (listed as A., B., C. etc.) are not mandatory and provide options for indicators to be used by auditors, indicator A. of clause 4.1.10 does not meet the benchmark standard, as this should also consider converted areas back to 31 December 2010 and restrict to the previous 3 years.</i></p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
b) entails a small proportion (no greater than 5 %) of forest type within the certified area; and	YES	<p>PEFC PL 1003ver2EN:2023</p> <p>"4.1.10 (...) covers a small portion (no more than 5%) of the forest type in question in the certified area</p> <p>Annex 1: Guidelines for interpretation of criteria for plantations (...)</p> <p>The requirement on "Conversion of forests to other land uses" means that plantations created by conversion after 31 December 2010 in circumstances other than "justified" do not meet this requirement and cannot be certified."</p>
c) does not have negative impacts on ecologically important forest areas, culturally and socially significant areas, or other protected areas; and	YES	<p>PEFC PL 1003ver2EN:2023</p> <p>"3.6 Ecologically important forest areas</p> <p>Forest areas</p> <p>a) containing protected, rare, sensitive or representative forest ecosystems;</p> <p>b) containing significant concentrations of endemic species and habitats of endangered species as defined in the recognised reference lists;</p> <p>c) containing genetic resources conserved in situ;</p> <p>d) contributing to maintaining globally, nationally or regionally significant landscapes compatible with their natural distribution and high diversity of naturally occurring species.</p> <p>4.1.10 (...) has no significant negative impact on ecologically important forest areas, culturally and socially important areas or other protected areas.</p> <p>Annex 1: Guidelines for interpretation of criteria for plantations (...)</p> <p>The requirement on "Conversion of forests to other land uses" means that plantations created by conversion after 31 December 2010 in circumstances other than "justified" do not meet this requirement and cannot be certified."</p> <p><i>Clause 4.1.10 refers to ecologically important woodland, which is not the same (wording) as ecologically important forest areas, therefore the requirement is not met. It shall be noted that the applied definition for ecologically important forest areas complies with the benchmark standard.</i></p>
d) does not destroy areas of significantly high carbon stock; and	YES	<p>PEFC PL 1003ver2EN:2023</p> <p>"4.1.10 (...) does not damage areas with high forest carbon stocks</p> <p>Annex 1: Guidelines for interpretation of criteria for plantations (...)</p>

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>The requirement on "Conversion of forests to other land uses" means that plantations created by conversion after 31 December 2010 in circumstances other than "justified" do not meet this requirement and cannot be certified."</p> <p><i>Observation: PEFC PL 1003ver2EN:2023 does not further define the wording "high forest carbon stocks", it therefore remains up to the interpretation of auditors how to assess this component.</i></p>
e) makes a contribution to long-term conservation, economic, and social benefits.	YES	<p>PEFC PL 1003ver2EN:2023</p> <p>"4.1.10 (...) is a source of long-term environmental, economic and social benefits</p> <p>Annex 1: Guidelines for interpretation of criteria for plantations (...)</p> <p>The requirement on "Conversion of forests to other land uses" means that plantations created by conversion after 31 December 2010 in circumstances other than "justified" do not meet this requirement and cannot be certified."</p>
8.1.5 The standard requires that afforestation of ecologically important non-forest ecosystems shall not occur unless in justified circumstances where the conversion:		
a) is in compliance with national and regional policy and legislation applicable for land use and forest management and is a result of national or regional land-use planning governed by a governmental or other official authority; and	YES	<p>PEFC PL 1003ver2EN:2023</p> <p>"4.1.11. Afforestation of ecologically important non-forest ecosystems shall not take place."</p> <p><i>It shall be noted that PEFC PL 1003ver2EN:2023 does not allow any afforestation of ecologically important non-forest ecosystems.</i></p>
b) is established based on a decision-making basis where affected stakeholders have opportunities to contribute to the decision-making on conversion through transparent and participatory consultation processes; and	YES	<p>PEFC PL 1003ver2EN:2023</p> <p>"4.1.11. Afforestation of ecologically important non-forest ecosystems shall not take place."</p>
c) does not have negative impacts on threatened (including vulnerable, rare or endangered) nonforest ecosystems, culturally and socially significant areas, important habitats of threatened species or other protected areas; and	YES	<p>PEFC PL 1003ver2EN:2023</p> <p>"4.1.11. Afforestation of ecologically important non-forest ecosystems shall not take place."</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
d) entails a small proportion of the ecologically important non-forest ecosystem managed by an organisation; and	YES	PEFC PL 1003ver2EN:2023 “4.1.11. Afforestation of ecologically important non-forest ecosystems shall not take place.”
e) does not destroy areas of significantly high carbon stock; and	YES	PEFC PL 1003ver2EN:2023 “4.1.11. Afforestation of ecologically important non-forest ecosystems shall not take place.”
f) makes a contribution to long-term conservation, economic, and social benefits.	YES	PEFC PL 1003ver2EN:2023 “4.1.11. Afforestation of ecologically important non-forest ecosystems shall not take place.”
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	YES	PEFC PL 1003ver2EN:2023 “4.1.13. If conversion of degraded forests to plantations is considered, such conversion shall have added value from an economic, ecological, social and/or cultural perspective. A prerequisite for such added value is the circumstances under which the conversion: is consistent with national or regional policies and laws on land use and forest management and is the result of a national or regional land use plan developed by the government or other authorities Annex 1: Guidelines for interpretation of criteria for plantations (...) The interpretation of para. 4.1.10 in this Annex shall not apply to paragraph 4.1.13.”
b) is established based on a decision-making basis where affected stakeholders have opportunities to contribute to the decision-making on conversion through transparent and participatory consultation processes; and	YES	PEFC PL 1003ver2EN:2023 “4.1.13 (...) is based on a decision-making process in which stakeholders affected by the standard have had the opportunity to participate through transparent consultation Annex 1: Guidelines for interpretation of criteria for plantations (...) The interpretation of para. 4.1.10 in this Annex shall not apply to paragraph 4.1.13.”
c) has a positive impact on long-term carbon sequestration capacity of forest vegetation; and	YES	PEFC PL 1003ver2EN:2023 “4.1.13 (...) has a positive impact on the long-term carbon sequestration capacity of forest vegetation Annex 1: Guidelines for interpretation of criteria for plantations (...) The interpretation of para. 4.1.10 in this Annex shall not apply to paragraph 4.1.13.”



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	YES	PEFC PL 1003ver2EN:2023 "4.1.13 (...) it has no significant adverse impacts on forest ecosystems with special requirements, on culturally and socially important areas or on protected areas Annex 1: Guidelines for interpretation of criteria for plantations (...) The interpretation of para. 4.1.10 in this Annex shall not apply to paragraph 4.1.13." <i>It is unclear what is meant with forest ecosystems with special requirements, therefore it is insufficiently ensured that afforestation shall not have negative impacts on ecologically important forest areas.</i>
e) safeguards protective functions of forests for society and other regulating or supporting ecosystem services; and	YES	PEFC PL 1003ver2EN:2023 "4.1.13 (...) safeguards the protective functions of forests for society and other regulating or supporting ecosystem services Annex 1: Guidelines for interpretation of criteria for plantations (...) The interpretation of para. 4.1.10 in this Annex shall not apply to paragraph 4.1.13."
f) safeguards socio-economic functions of forests, including the recreational function and aesthetic values of forests and other cultural services; and	YES	PEFC PL 1003ver2EN:2023 "4.1.13 (...) safeguards the socio-economic functions of forests, including their recreational function and the aesthetic values of forests and other cultural services Annex 1: Guidelines for interpretation of criteria for plantations (...) The interpretation of para. 4.1.10 in this Annex shall not apply to paragraph 4.1.13."
g) has a land history providing evidence that the degradation is not the consequence of deliberate poor forest management practices; and	YES	PEFC PL 1003ver2EN:2023 "4.1.13 (...) is based on evidence that degradation is not a consequence of deliberate action Annex 1: Guidelines for interpretation of criteria for plantations (...) The interpretation of para. 4.1.10 in this Annex shall not apply to paragraph 4.1.13."
h) is based on credible evidence demonstrating that the area is neither recovered nor in the process of recovery.	YES	PEFC PL 1003ver2EN:2023 "4.1.13 (...) is based on reliable information demonstrating that the area has not been, or is not being, restored. Annex 1: Guidelines for interpretation of criteria for plantations (...) The interpretation of para. 4.1.10 in this Annex shall not apply to paragraph 4.1.13."
8.2 Criterion 2: Maintenance of forest ecosystem health and vitality		

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
8.2.1 The standard requires that health and vitality of forest ecosystems shall be maintained or enhanced and degraded forest ecosystems shall be rehabilitated wherever and as far as economically feasible, by making best use of natural structures and processes and using preventive biological measures.	YES	<p>PEFC PL 1003ver2EN:2023</p> <p>“4.2.1. Forest management planning shall aim at a forest structure that ensures the long-term maintenance of its regenerative potential, vitality, health and ability to perform all important protective, economic and social functions without detriment to other ecosystems, and the restoration and management of degrading forests, as far as this is possible within the framework of available forestry techniques and legislation.</p> <p>4.2.5. Forest management shall be based on the optimal use of natural forest-forming processes and make use of preventive biological methods insofar as they are economically feasible.</p> <p>Annex 1: Guidelines for interpretation of criteria for plantations (...) In the case of plantations, requirements (...) 4.2.1 (...) cannot be applied to individual stands and shall be considered at a higher (regional) level in terms of the whole management/administrative unit, where fast-growing stands are complemented by buffer zones and set-aside areas with their environmental, ecological, cultural and social functions.</p> <p>In order to enhance landscape value and biodiversity, water and soil conservation rules, the size and distribution of buffer strips and protected set-aside areas shall be defined at the preparatory stage of plantation establishment. Decisions shall be taken on the basis of social, environmental and ecological assessments, and these shall be reviewed in subsequent production cycles.”</p>
8.2.2 The standard requires that adequate genetic, species and structural diversity shall be encouraged or maintained to enhance the stability, vitality and resilience of the forests to adverse environmental factors and strengthen natural regulation mechanisms.	YES	<p>PEFC PL 1003ver2EN:2023</p> <p>“4.2.5. Forest management shall be based on the optimal use of natural forest-forming processes and make use of preventive biological methods insofar as they are economically feasible. Efforts shall be made to achieve and maintain genetic, species and structural diversity that enhance the stability, vitality and resilience of forests in the face of adverse environmental factors and reinforce natural regulatory mechanisms.</p> <p>Annex 1: Guidelines for interpretation of criteria for plantations (...) In the case of plantations, requirements (...) 4.2.5 (...) cannot be applied to individual stands and shall be considered at a higher (regional) level in terms of the whole management/administrative unit, where fast-growing stands are complemented by buffer zones and set-aside areas with their environmental, ecological, cultural and social functions.</p> <p>In order to enhance landscape value and biodiversity, water and soil conservation rules, the size and distribution of buffer strips and protected set-aside areas shall be defined at the preparatory stage of</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		plantation establishment. Decisions shall be taken on the basis of social, environmental and ecological assessments, and these shall be reviewed in subsequent production cycles.”
8.2.3 The standard requires that use of fire shall be limited to regions where fire is an essential tool in forest management for regeneration, wildfire protection and habitat management or a recognized practice of indigenous peoples. In these cases adequate management and control measures shall be taken.	YES	PEFC PL 1003ver2EN:2023 “4.2.6. Fire lighting in the forest shall be restricted to areas where fire is an essential management tool for regeneration, forest protection, forest fire protection, proper health and safety conditions, habitat management and recreational functions in permitted areas. Management and control measures shall be taken in such cases.”
8.2.4 The standard requires that appropriate forest management practices such as reforestation and afforestation with tree species and provenances that are suited to the site conditions or the use of tending, harvesting and transport techniques that minimise tree and/or soil damages shall be applied.	YES	PEFC PL 1003ver2EN:2023 “4.2.7. Good forest management practices, such as afforestation and reforestation with tree species adapted to natural conditions and the use of care, use and transport techniques that limit tree and/or soil damage shall be applied.” <i>Observation: the wording “the use of care, use and transport techniques” is a bit vague.</i>
8.2.5 The standard requires that the indiscriminate disposal of waste on forest land shall be strictly avoided. Non-organic waste and litter shall be collected, stored in designated areas and removed in an environmentally-responsible manner. The spillage of oil or fuel during forest management operations shall be prevented. Emergency procedures for the minimisation of risk of environmental harm arising from the accidental spillage shall be in place.	YES	PEFC PL 1003ver2EN:2023 “4.2.7 (...) Fuel and oil spills during forest management activities and uncontrolled dumping of waste on forest land shall be strictly avoided. When carrying out work where there is a risk of oil spillage, use oil that does not pollute the environment (biodegradable oil). If the certified organisation carries out this type of work itself, then it shall have procedures in place in case such events occur. If the work is outsourced to a contractor, then the contracts for the work shall include requirements to have such procedures in place. Waste must be collected and disposed of in an environmentally friendly manner.”
8.2.6 The standard requires that integrated pest management, appropriate silviculture alternatives and other biological measures shall be preferred to minimise the use of pesticides.	YES	PEFC PL 1003ver2EN:2023 “4.2.5. Forest management shall be based on the optimal use of natural forest-forming processes and make use of preventive biological methods insofar as they are economically feasible. Efforts shall be made to achieve and maintain genetic, species and structural diversity that enhance the stability, vitality and resilience of forests in the face of adverse environmental factors and reinforce natural regulatory mechanisms.



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		4.2.8. Integrated pest management shall be applied first and foremost to minimise the use of pesticides."
8.2.7 The standard requires that any use of pesticides is documented.	YES	PEFC PL 1003ver2EN:2023 "4.2.8 (...) Any use of pesticides shall be documented."
8.2.8 The standard requires that the WHO Class 1A and 1B pesticides and other highly toxic pesticides shall be prohibited, except where no other viable alternative is available. Any exception to the usage of WHO Class 1A and 1B pesticides shall be defined in the national/regional standard.	YES	PEFC PL 1003ver2EN:2023 "4.2.9. The use of pesticides containing active substances classified by the World Health Organisation in classes 1A and 1B and other highly toxic pesticides shall not be allowed except where no other viable alternative is available. Their use shall only be permitted where the sustainability of the forest is threatened."
8.2.9 The standard requires that pesticides, such as chlorinated hydrocarbons whose derivatives remain biologically active and accumulate in the food chain beyond their intended use, and any pesticides banned by international agreement, shall be prohibited. Note: "Pesticides banned by international agreements" are defined in the Stockholm Convention on Persistent Organic Pollutants.	YES	PEFC PL 1003ver2EN:2023 "4.2.10. The use of pesticides, such as chlorinated hydrocarbons, whose derivatives remain biologically active and accumulate in the food chain above permitted levels, as well as pesticides prohibited under international agreements, shall be prohibited. Note: "pesticides prohibited under international agreements" as defined by the in the Stockholm Convention on Persistent Organic Pollutants, 2009 (as amended)."
8.2.10 The standard requires that the use of pesticides shall follow the instructions given by the pesticide producer and be implemented with proper equipment by trained personnel.	YES	PEFC PL 1003ver2EN:2023 "4.2.11. When using pesticides, follow the directions for use (product label) and use training and safe and suitable equipment."
8.2.11 The standard requires that where fertilisers are used, they shall be applied in a controlled manner and with due consideration for the environment. Fertilizer use shall not be an alternative to appropriate soil nutrient management.	YES	PEFC PL 1003ver2EN:2023 "4.2.12. Fertilisers shall be used in a controlled and environmentally sensitive way. The use of fertilisers is not an alternative to soil nutrient management."
8.3 Criterion 3: Maintenance and encouragement of productive functions of forests (wood and non-wood)		



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
8.3.1 The standard requires that the capability of forests to produce a range of wood and non-wood forest products and services on a sustainable basis shall be maintained.	YES	<p>PEFC PL 1003ver2EN:2023</p> <p>“4.1.9. Forest management shall ensure the maintenance of the sustainability, quality and quantity of forest resources in the medium and long term by balancing the rate of harvesting and restoration and by choosing methods that limit direct or indirect damage to forest resources.</p> <p>Forest management activities shall be aimed at maintaining the level or achieving an increase in resources desirable for economic, ecological and social reasons.</p> <p>4.3.4. Forest management shall preserve and, where possible, increase forest resources and aim to diversify the production of goods and services in the long term.</p> <p>4.3.5. Forest management activities shall take place at times and in ways that and in a manner that does not limit the productive capacity of the forest.”</p>
8.3.2 The standard requires that sound economic performance shall be pursued, taking into account possibilities for new markets and economic activities in connection with all relevant goods and services of forests.	YES	<p>PEFC PL 1003ver2EN:2023</p> <p>“4.3.2. Forest management planning shall aim to achieve optimum economic results, using available market research and opportunities to expand into new markets with forest products and services.”</p>
8.3.3 The standard requires that management, harvesting and regeneration operations shall be carried out at a time, and in a way, that does not reduce the productive capacity of the site, for example by avoiding damage to soil and retained stands and trees.	YES	<p>PEFC PL 1003ver2EN:2023</p> <p>“4.3.5. Forest management activities shall take place at times and in ways that and in a manner that does not limit the productive capacity of the forest. In particular, damage to standing trees and degradation of forest soils shall be limited.”</p>
8.3.4 The standard requires that harvesting levels of both wood and non-wood forest products shall not exceed a rate that can be sustained in the long term, and optimum use shall be made of the harvested products.	YES	<p>PEFC PL 1003ver2EN:2023</p> <p>“4.3.6. The level of planned use of forest timber and non-timber resources shall guarantee the long-term sustainable development of the area, and the harvested forest products shall be used optimally, ensuring the renewability of forest resources.</p> <p>Annex 1: Guidelines for interpretation of criteria for plantations (...)</p> <p>4.3.6 (...) In the case of plantations, nutrient decline must be taken into account. This is of particular importance and shall be an important part of the planning and management stage of the production cycle.”</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
8.3.5 The standard requires that adequate infrastructure such as roads, skid tracks or bridges shall be planned, established and maintained to ensure efficient delivery of goods and services while minimising negative impacts on the environment.	YES	PEFC PL 1003ver2EN:2023 “4.3.8 Transport infrastructure, i.e. roads, operational routes and bridges, shall be planned, established and maintained to ensure an efficient system for the provision of products and services, while limiting negative impacts on the environment.”
8.4 Criterion 4: Maintenance, conservation and appropriate enhancement of biological diversity in forest ecosystems		
8.4.1 The standard requires that management planning shall aim to maintain, conserve or enhance biodiversity on landscape, ecosystem, species and genetic levels.	YES	PEFC PL 1003ver2EN:2023 “4.4.1. Forest management planning shall aim to conserve, protect and enhance natural biodiversity at the genetic, species, ecosystem and landscape levels. Annex 1: Guidelines for interpretation of criteria for plantations (...) In the case of plantations, requirements (...) 4.4.1 (...) cannot be applied to individual stands and shall be considered at a higher (regional) level in terms of the whole management/administrative unit, where fast-growing stands are complemented by buffer zones and set-aside areas with their environmental, ecological, cultural and social functions. In order to enhance landscape value and biodiversity, water and soil conservation rules, the size and distribution of buffer strips and protected set-aside areas shall be defined at the preparatory stage of plantation establishment. Decisions shall be taken on the basis of social, environmental and ecological assessments, and these shall be reviewed in subsequent production cycles.”
8.4.2 The standard requires that inventory, mapping and planning of forest resources shall identify, protect, conserve or set aside ecologically important forest areas. Note: This does not prohibit forest management activities that do not damage the important ecologic values of those biotopes.	YES	PEFC PL 1003ver2EN:2023 “4.1.2. Forest management shall encompass a cycle of forest resource inventory and management action planning, implementation, monitoring and evaluation, and include assessment of their social, environmental and economic impact. (...) An inventory of forest resources shall be carried out and its results mapped according to local or national conditions. 4.4.2. Forest inventory and management shall identify, protect and conserve ecologically important forest areas. Note: Forest management activities that do not destroy the essential ecological values of these biotopes are not prohibited. Annex 1: Guidelines for interpretation of criteria for plantations (...) The requirement set out in 4.4.2 shall be addressed primarily at the stage of establishment of plantations. The areas referred to in the requirement shall form part of buffer strips and set-aside areas, which have specific environmental, ecological, cultural and social functions.”



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>Additional explanation provided by PEFC Poland</p> <p>“During the working group’s work, we reflected on this. According to group members, the inventory itself includes mapping. Of course, understanding that mapping is “marking on a map the details of a site based on materials obtained from measurements or source materials.” In Polish conditions, the inventory of forest resources always involves depicting them on a map.”</p>
<p>8.4.3 The standard requires that protected, threatened and endangered plant and animal species shall not be exploited for commercial purposes. Where necessary, measures shall be taken for their protection and, where relevant, to increase their population.</p> <p>Note: The requirement does not preclude trade according to CITES requirements.</p>	YES	<p>PEFC PL 1003ver2EN:2023</p> <p>“4.4.3 Protected and endangered plant, animal and fungi species shall not be used in an unlawful manner. Where necessary, measures shall be implemented to protect them and, where appropriate, to increase their population”</p> <p>Explanation provided by PEFC Poland</p> <p>“Regulation of the Minister of the Environment of October 9, 2014 on the species protection of plants</p> <p>§ 1. The regulation defines:</p> <p>1) species of plants:</p> <p>(a) under strict protection, specifying species requiring active protection,</p> <p>b) covered by partial protection,</p> <p>c) covered by partial protection, which may be harvested, and the methods of their harvesting,</p> <p>d) requiring the establishment of zones for the protection of their refuges or sites;</p> <p>§ 6. 1. The following prohibitions shall be introduced with respect to wild plants belonging to species under strict and partial protection, referred to in Annex No. 1 and in items 1-300 of Annex No. 2 to the Regulation: (...)</p> <p>4) harvesting or collecting;</p> <p>5) keeping or possessing specimens of species;</p> <p>6) to sell, offer for sale, exchange, donate or transport specimens of species, except that the prohibition of transport applies to species marked with symbol (2) in Annex 1 to the Regulation;</p> <p>7) import from abroad or export outside the state border of specimens of species;</p> <p>8) deliberate movement in the natural environment;</p> <p>9) intentional introduction into the natural environment.”</p>

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
8.4.4 The standard requires that successful regeneration shall be ensured through natural regeneration or planting that is adequate to ensure the quantity and quality of the forest resources.	YES	<p>PEFC PL 1003ver2EN:2023</p> <p>“4.1 (...) Forest management shall aim to maintain or enhance forests and their ecosystem services (...) The quantity and quality of forest resources and the forest’s capacity to capture and store carbon shall be safeguarded in the medium to long term by sustainable harvesting and tree growth rates and by favouring techniques that minimise the adverse impacts of human activities on forest resources.</p> <p>4.4.4. Forest management shall ensure the regeneration of forest resources by favouring natural processes where possible and justified.”</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 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>	YES	<p>PEFC PL 1003ver2EN:2023</p> <p>“4.4.5. In the case of reforestation and afforestation, native species and local ecotypes adapted to the habitat conditions of the site shall be used. Only those alien species that are not legally sanctioned in Poland as threatening to native species and habitats may be introduced into the environment.</p> <p>Note: The Convention on Biological Diversity’s Basic Principles on Preventing, Introducing and Mitigating the Impacts of Alien Species that Threaten Ecosystems, Habitats or Species are considered valid guidelines for avoiding invasive species.</p> <p>Annex 1: Guidelines for interpretation of criteria for plantations (...)</p> <p>Requirements 4.4.5 (...) are generally not applicable to plantations. They shall be considered primarily applicable to buffer zones and set-aside areas with specific environmental, ecological, cultural and social functions. (...) The assessment of the impact of 'introduced alien species' shall be understood to be particularly important for plantations. Such assessment shall be an important part of the planning and management phase of the production cycle.”</p> <p>Explanation provided by PEFC Poland</p> <p>“In Poland, the handling of invasive species is regulated by Article 120 of the Law on Nature Protection of April 16, 2004 (Journal of Laws of 2013, item 627, as amended), prohibiting their introduction into the natural environment and movement within it. Invasive species in Poland are considered to be those listed in the appendix to the Regulation of the Minister of Environment of September 9, 2011 on the list of plants and animals of alien species which, if released into the natural environment, may threaten native species or natural habitats.</p> <p>The Law of August 11, 2021 on Alien Species (Journal of Laws, item 1718), which came into force on December 18, 2021, establishes a national legal framework for countering Invasive Alien Species posing</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		a threat to the Union and introduces complementary provisions for IGOs posing a threat to Poland. The law also includes provisions for all alien species so as to prevent their spread in the environment.”
8.4.6 The standard requires that afforestation, reforestation and other tree planting activities that contribute to the improvement and restoration of ecological connectivity shall be promoted.	YES	PEFC PL 1003ver2EN:2023 “4.4.6. Afforestation contributing to the improvement and restoration of the continuity of ecological corridors shall be promoted.”
8.4.7 The standard requires that genetically-modified trees shall not be used. Note: The restriction on the usage of genetically-modified trees has been adopted by the PEFC General Assembly based on the Precautionary Principle. Until enough scientific data on genetically modified trees indicates that impacts on human and animal health and the environment are equivalent to, or more positive than, those presented by trees genetically improved by traditional methods, no genetically-modified trees will be used.	YES	PEFC PL 1003ver2EN:2023 “4.4.7. Genetically modified trees shall not be introduced into the environment. Note: The ban on the introduction of genetically modified trees into the environment was adopted by the PEFC General Assembly on a precautionary basis. Genetically modified trees will not be introduced until sufficient scientific data on them have demonstrated that their impact on human and animal health and the environment is equivalent or more beneficial than that offered by trees genetically improved by conventional methods.” <i>Observation: the note describes the future conditions under which genetically modified trees might be introduced, which might be misinterpreted by companies to already use these trees when they themselves argue to have sufficient scientific proof. However, since 4.7 clearly prohibits the use, and the note also includes a description of the ban, this is not considered a nonconformity.</i>
8.4.8 The standard requires that a diversity of both horizontal and vertical structures and the diversity of species such as mixed stands shall be promoted, where appropriate. The practices shall also aim to maintain or restore landscape diversity.	YES	PEFC PL 1003ver2EN:2023 “4.4.8. Forest management shall, where appropriate, promote the structural diversity of forests, e.g. mixed, multi-aged and multi-storey stands, which at the same time serves to maintain or restore landscape diversity. Note: In the forest environment there are single species stands, which are valuable elements of the native nature (e.g. mountain and lowland beech forests, alder forests, hornbeam forests). Annex 1: Guidelines for interpretation of criteria for plantations (...) Requirements (...) 4.4.8 (...) are generally not applicable to plantations. They shall be considered primarily applicable to buffer zones and set-aside areas with specific environmental, ecological, cultural and social functions.”
8.4.9 The standard requires that traditional management practices that create valuable ecosystems	YES	PEFC PL 1003ver2EN:2023



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
on appropriate sites shall be supported, where appropriate.		<p>"4.4.9. In the case of valuable ecosystems, the traditional management practices that led to their creation shall be supported, as far as is reasonable and legally possible.</p> <p>Annex 1: Guidelines for interpretation of criteria for plantations (...)</p> <p>Requirements (...) 4.4.8 (...) are generally not applicable to plantations. They shall be considered primarily applicable to buffer zones and set-aside areas with specific environmental, ecological, cultural and social functions."</p>
8.4.10 The standard requires that tending and harvesting operations shall be conducted in a way that does not cause lasting damage to ecosystems. Wherever possible, practical measures shall be taken to maintain or improve biological diversity.	YES	<p>PEFC PL 1003ver2EN:2023</p> <p>"4.1 (...) Forest management shall aim to maintain or enhance forests and their ecosystem services and to maintain or enhance the economic, ecological, cultural and social values of forest resources.</p> <p>4.2.5. Forest management shall be based on the optimal use of natural forest-forming processes and make use of preventive biological methods insofar as they are economically feasible. Efforts shall be made to achieve and maintain genetic, species and structural diversity that enhance the stability, vitality and resilience of forests in the face of adverse environmental factors and reinforce natural regulatory mechanisms.</p> <p>4.4.1. Forest management planning shall aim to conserve, protect and enhance natural biodiversity at the genetic, species, ecosystem and landscape levels.</p> <p>4.4.8. Forest management shall, where appropriate, promote the structural diversity of forests, e.g. mixed, multi-aged and multi-storey stands, which at the same time serves to maintain or restore landscape diversity.</p> <p>4.4.10. Maintenance and use of forest areas shall be carried out in a way that does not cause permanent damage to ecosystems."</p>
8.4.11 The standard requires that infrastructure shall be planned and constructed in a way that minimizes damage to ecosystems, especially to rare, sensitive or representative ecosystems and genetic reserves, and that takes threatened or other key species – in particular their migration patterns – into consideration.	YES	<p>PEFC PL 1003ver2EN:2023</p> <p>"4.4.11. Infrastructure shall be designed and built in a way that minimises damage to the ecosystem, especially to rare, vulnerable or representative ecosystems and genetic reserves, taking into account migration routes."</p>
8.4.12 The standard requires that, with due regard to management objectives, measures shall be taken to	YES	<p>PEFC PL 1003ver2EN:2023</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
control the pressure of animal populations on forest regeneration and growth as well as on biodiversity.		"4.4.12. Taking into account forest management objectives and legal requirements, measures shall be taken to reduce excessive pressure from game populations that threaten the regeneration and development of the forest and the maintenance of biodiversity."
8.4.13 The standard requires that standing and fallen dead wood, hollow trees, old groves and rare tree species shall be left in quantities and distribution necessary to safeguard biological diversity, taking into account the potential effect on the health and stability of forests and on surrounding ecosystems.	YES	<p>PEFC PL 1003ver2EN:2023</p> <p>"4.4.13. Dead wood, hollow trees and groups of old trees and very rare native tree and shrub species shall be left to maintain biodiversity, taking into account potential impacts on the health of forest stands, the stability of surrounding ecosystems and the safety of people in highly frequented areas.</p> <p>Annex 1: Guidelines for interpretation of criteria for plantations (...)</p> <p>Requirements (...) 4.4.8 (...) are generally not applicable to plantations. They shall be considered primarily applicable to buffer zones and set-aside areas with specific environmental, ecological, cultural and social functions."</p> <p><i>Observation: the wording "highly frequented areas" is vague, but assumed to mean "frequently visited areas".</i></p>
8.5 Criterion 5: Maintenance or appropriate enhancement of protective functions in forest management (notably soil and water)		
8.5.1 The standard requires that protective functions of forests for society, such as their potential role in erosion control, flood prevention, water purification, climate regulation, carbon sequestration and other regulating or supporting ecosystem services shall be maintained or enhanced.	YES	<p>PEFC PL 1003ver2EN:2023</p> <p>"4.5.1. Forest management planning shall aim to maintain and enhance the protective and regulatory functions of forests, such as soil erosion control, flood control, water purification, climate regulation, carbon sequestration and other regulatory and support services of the ecosystem."</p>
8.5.2 The standard requires that areas that fulfil specific and recognised protective functions for society shall be mapped, and forest management plans and operations shall ensure the maintenance or enhancement of these functions.	YES	<p>PEFC PL 1003ver2EN:2023</p> <p>"4.1.2. Forest management shall encompass a cycle of forest resource inventory and management action planning, implementation, monitoring and evaluation, and include assessment of their social, environmental and economic impact. This mechanism shall form the basis for continual improvement of the management process, which makes it possible to reduce or avoid the negative effects of the activities carried out. An inventory of forest resources shall be carried out and its results mapped according to local or national conditions</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>4.5.1. Forest management planning shall aim to maintain and enhance the protective and regulatory functions of forests, such as soil erosion control, flood control, water purification, climate regulation, carbon sequestration and other regulatory and support services of the ecosystem.</p> <p>4.5.2. Management plans or their equivalents shall take into account the presence of protective forests.”</p> <p>Explanation provided by PEFC Poland</p> <p>“The State Forests have a rather complex information system that allows them to pose various queries to the database obtained following the inventory and illustrate them in a GIS viewer and, of course, print it out. (...) and protection of sensitive habitats, the surroundings of streams and water bodies. It is normal practice to draw up sketches of forestry work on cutting area, with the net of strip roads and marking these areas and excluding them from the work.</p> <p>(...) The result of the work related to the forest management plan is a tabular listing of all forest divisions and subdivisions, along with their detailed description regarding the occurrence of tree species, undergrowth plants and also the functions that this forest performs. Based on this data in a GIS viewer, much of this data can be illustrated, including the occurrence and distribution of protective forests.</p> <p>The forest inventory is based on a manual, which consists of three parts:</p> <p>Part 1. Instruction on the drafting of a forest management plan for a forest district.</p> <p>Part 2. Instruction on distinguishing and mapping forest habitat types and plant communities in the State Forests</p> <p>Part 3: Technical Instruction on drawing up and printing forest maps</p> <p>One of the tasks carried out during the management work is the development of protection tasks. If valuable habitats or rare species are located during fieldwork, they are taken into account.</p> <p>Law of September 28, 1991 on Forests, Article 15</p> <p>Specially protected forests, hereinafter referred to as “protective forests,” may be considered forests that:</p> <ol style="list-style-type: none"> 1) protect the soil from scouring or depletion, stop soil removal, rockfall or avalanches; 2) protect surface water and groundwater resources, regulate hydrological relations in the catchment area and in watershed areas; 3) limit the formation or spread of volatile sands;

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>4) are permanently damaged by industrial activity;</p> <p>5) are seed stands or refuges of animals and sites of plants subject to species protection;</p> <p>6) are of special natural and scientific importance or for the defense and security of the State;</p> <p>7) are located:</p> <p>(a) within the administrative boundaries of cities and within 10 km from the administrative boundaries of cities with more than 50,000 inhabitants,</p> <p>b) in the protective zones of spas and areas of spa protection within the meaning of the Act of July 28, 2005 on spa treatment, spas and areas of spa protection and on spa municipalities (Journal of Laws of 2021, item 1301), © in the zone of the upper limit of forests.</p> <p>Article 16.</p> <p>(9) The Minister responsible for the environment shall, by decision, recognize a forest as protective or deprive it of this character, on the proposal of the Director General, with the opinion of the municipal council – for forests owned by the State Treasury.</p> <p>1a. The district governor, after consultation with the owner of the forest and with the opinion of the municipal council, by decision, recognizes the forest as protective or deprives it of this character – for other forests.</p> <p>(2) The municipal council should express an opinion within two months from the date of receipt of the request for its expression. If this time limit expires, the municipal council shall be deemed to have no objections.</p> <p>Article 17.</p> <p>The Minister of Environmental Affairs shall determine, by decree, detailed rules and procedures for the recognition of forests as protective forests and detailed rules for forest management in them.”</p>
8.5.3 The standard requires that special care shall be given to forestry operations on sensitive soils and erosion-prone areas as well as in areas where operations might lead to excessive erosion of soil into watercourses. Techniques applied and the machinery used shall be suitable for such areas. Special measures shall be taken to minimise the pressure of animal populations on these areas.	YES	<p>PEFC PL 1003ver2EN:2023</p> <p>“4.5.3. Special care shall be taken during forestry operations on land and in areas prone to soil erosion as well as in areas where operations could lead to excessive soil erosion within watercourses. Soil preparation methods and machinery shall not lead to soil erosion.</p> <p>4.4.12. Taking into account forest management objectives and legal requirements, measures shall be taken to reduce excessive pressure from game populations that threaten the regeneration and development of the forest and the maintenance of biodiversity.”</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
8.5.4 The standard requires that special care shall be given to forestry operations in forest areas with water protection functions to avoid adverse effects on the quality and quantity of water resources. Inappropriate use of chemicals or other harmful substances or inappropriate silvicultural practices influencing water quality in a harmful way shall be avoided. Downstream water balance and water quality shall not be significantly affected by the operations.	YES	<p>PEFC PL 1003ver2EN:2023</p> <p>“4.5.4. Special care shall be taken during forestry operations carried out in forest areas that have a protective function for water resources to avoid adverse effects on the quantity and quality of these resources. The use of chemicals or other harmful substances and forestry techniques that adversely affect the quality of water resources shall be avoided.”</p> <p>Explanation provided by PEFC Poland</p> <p>“Caution in conducting forestry work in the vicinity of watercourses is recommended by the Forest Use Rules (item 53 in Chapter 2). The quality of the work is assessed by the forester supervising the work (the work is carried out by private companies) and the State Forestry Inspectorate during regular inspections.”</p>
8.5.5 The standard requires that construction of roads, bridges and other infrastructure shall be carried out in a manner that minimises bare soil exposure, avoids the introduction of soil into watercourses and preserves the natural level and function of water courses and river beds. Proper road drainage facilities shall be installed and maintained.	YES	<p>PEFC PL 1003ver2EN:2023</p> <p>“4.5.5 The construction of roads, bridges and other infrastructure as part of own developments shall be carried out in such a way as to limit destructive soil exposure and excessive inputs to watercourses and water bodies while maintaining their natural level and function. Where necessary, drainage facilities for unit-owned roads shall be installed and maintained.”</p>
8.6 Criterion 6: Maintenance or appropriate enhancement of socio-economic functions and conditions		
8.6.1 The standard requires that forest management planning shall aim to respect all socio-economic functions of forests.	YES	<p>PEFC PL 1003ver2EN:2023</p> <p>“4.6.1. Forest management planning shall respect the multiple functions of forests, take into account the role of forestry in rural development and take account of the labour market situation.</p> <p>4.6.6. Forest management measures shall take into account socio-economic functions, especially the recreational function and aesthetic values of forests, inter alia by maintaining a diverse forest structure. However, such activities shall be conducted in a manner and to the extent that they do not adversely affect forest resources.</p> <p>Annex 1: Guidelines for interpretation of criteria for plantations (...) In the case of plantations, requirements (...) 4.6.6 cannot be applied to individual stands and shall be considered at a higher (regional) level in terms of the whole management/administrative unit, where fast-growing stands are complemented by buffer zones and set-aside areas with their environmental, ecological, cultural and social functions.</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		In order to enhance landscape value and biodiversity, water and soil conservation rules, the size and distribution of buffer strips and protected set-aside areas shall be defined at the preparatory stage of plantation establishment. Decisions shall be taken on the basis of social, environmental and ecological assessments, and these shall be reviewed in subsequent production cycles.”
8.6.2 The standard requires that adequate public access to forests for the purpose of recreation shall be provided, taking into account respect for ownership rights, safety and the rights of others, the effects on forest resources and ecosystems, as well as compatibility with other functions of the forest.	YES	PEFC PL 1003ver2EN:2023 “4.4.13. Dead wood, hollow trees and groups of old trees and very rare native tree and shrub species shall be left to maintain biodiversity, taking into account potential impacts on the health of forest stands, the stability of surrounding ecosystems and the safety of people in highly frequented areas. 4.6.4. Universal access to forests shall be ensured, respecting property rights and restrictions on access to forests under existing law, taking into account impacts on forest resources and ecosystems, and linkages with other forest functions. 4.6.6. Forest management measures shall take into account socio-economic functions, especially the recreational function and aesthetic values of forests, inter alia by maintaining a diverse forest structure. However, such activities shall be conducted in a manner and to the extent that they do not adversely affect forest resources.”
8.6.3 The standard requires that sites with recognised specific historical, cultural or spiritual significance and areas fundamental to meeting the needs of indigenous peoples and local communities (e.g. health, subsistence) shall be protected or managed in a way that takes due regard of the significance of the site.	YES	PEFC PL 1003ver2EN:2023 “4.6.5 Places of historical, cultural or spiritual significance shall be protected and managed in a way that recognises their special significance.”
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.	YES	PEFC PL 1003ver2EN:2023 “4.6.2. Forest management shall support the long-term sustainability and quality of life of local communities.”
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	YES	PEFC PL 1003ver2EN:2023 “4.6.8. Forest management activities shall also draw on the local experience and knowledge of forest owners, local communities and NGOs.”



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
forest owners, NGOs, local communities, and indigenous peoples. Equitable sharing of the benefits arising from the utilization of such knowledge shall be encouraged.		
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.	NO	<p>PEFC PL 1003ver2EN:2023</p> <p>“4.6.9. FMU shall provide for education, communication and consultation with local communities and other stakeholders on sustainable forest management. Mechanisms shall be in place to respond to complaints and to resolve forest management related disputes between forest managers and the local population.”</p> <p>Explanation provided by PEFC Poland</p> <p>“Forest management is based on economic principles. New employees are hired when the need arises. The potential number of places increases seasonally, when workers are needed for forest nurseries and silviculture.”</p> <p><i>It is insufficiently ensured that management shall give consideration to new opportunities for employment of local people. Although this might go well in practice, it is insufficiently ensured in the requirements of the standard.</i></p>
8.6.7 The standard requires that forest management shall contribute to research activities and data collection needed for sustainable forest management or support relevant research activities carried out by other organisations, as appropriate.	YES	<p>PEFC PL 1003ver2EN:2023</p> <p>“4.6.15. Forest management shall also be based on the results of scientific research.</p> <p>4.6.20. The implementation of forest management shall allow for research activities and data collection necessary for improving sustainable forest management, or support dedicated research activities by other organisations.”</p>
9. Performance evaluation		
9.1 Monitoring, measurement, analysis and evaluation		
9.1.1 The standard requires that monitoring of forest resources and evaluation of their management, including ecological, social and economic effects, shall be periodically performed, and results fed back into the planning process.	YES	<p>PEFC PL 1003ver2EN:2023</p> <p>“4.1.2. Forest management shall encompass a cycle of forest resource inventory and management action planning, implementation, monitoring and evaluation, and include assessment of their social, environmental and economic impact.</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		4.1.7. Forest resources shall be periodically monitored and forest management evaluated, including its ecological, social and economic effects. Based on data and analysis, actions shall be planned for the next project period."
9.1.2 The standard requires that health and vitality of forests shall be periodically monitored, especially key biotic and abiotic factors that potentially affect health and vitality of forest ecosystems, such as pests, diseases, overgrazing and overstocking, fire, and damage caused by climatic factors, air pollutants or by forest management operations.	YES	PEFC PL 1003ver2EN:2023 "4.2.2. Forest health and vitality shall be monitored periodically, especially as regards the main biotic, abiotic and anthropogenic factors that may adversely affect them."
9.1.3 The standard requires that where it is the responsibility of the forest owner/manager and included in forest management, the use of non-wood forest products, including hunting and fishing, shall be regulated, monitored and controlled.	YES	PEFC PL 1003ver2EN:2023 "4.3.7. Where the management responsibilities of the forest owner/manager include the use of non-timber forest resources, including hunting, they shall monitor and control these activities." Explanation provided by PEFC Poland "Forest Act: Article 27 (2) The harvesting of non-wood forest products (mushrooms, berries, herbs etc.) for industrial purposes shall require an agreement with the forestry division. (3) The forest district manager shall refuse to conclude an agreement if the harvesting of non-wood forest products threatens the forest environment. (5) The minister responsible for the environment shall define, by means of a regulation, detailed rules for the protection and harvesting of non-wood forest products and rules for the location of apiaries in forest areas. In Poland, matters related to hunting are regulated by the ACT of 13 October 1995. Hunting Law. Selected articles of the Act: Art. 2. Game animals, as a national asset, are the property of the State Treasury. Principles of hunting management Art. 8. 1. Hunting management shall be carried out in hunting circuits by leaseholders or managers. (2) Hunting management shall be carried out in accordance with the principles specified in the Act, based on annual hunting plans and long-term hunting breeding plans. (...)



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>Article 8a. (1) The annual hunting plan shall be drawn up for the period from 1 April to 31 March of the following year (hunting marketing year), in particular on the basis of an inventory of game.</p> <p>(2) The game inventory shall be drawn up by the lessees or managers of hunting districts by 10 March each year and shall contain an estimate of the number of game animals present, excluding migratory game birds, as of 10 March of the year in which the annual hunting plan is drawn up, with a breakdown by species, big game and small game and, in the case of big game excluding wild boar, also by individuals under one year of age and sex.</p> <p>(9) The annual hunting plan shall be drawn up by the lessee of the hunting district, after consultation with the competent mayors and the competent chamber of agriculture, and shall be subject to approval by the competent head of the State Forest Holding in agreement with the Polish Hunting Association. Where a hunting circuit is located within the boundaries of more than one forest district, the annual hunting plan for this circuit shall be approved by the forest district superintendent competent for the area in which the largest part of this circuit is located.</p> <p>Article 8c. (1) A multi-annual hunting breeding plan shall be drawn up for neighbouring hunting districts with similar natural conditions (breeding region), for a period of 10 consecutive hunting marketing years.</p> <p>The forester district manager may approve the hunting plan, approve it partially (for certain game species) or reject it.</p> <p>Matters related to fishing are regulated by the ACT of 18 April 1985 on inland fishing.</p>
9.1.4 The standard requires that working conditions shall be regularly monitored and adapted as necessary.	YES	<p>PEFC PL 1003ver2EN:2023</p> <p>“4.6.11. Forest operations shall be planned, organized and carried out in such a way that health risks and accident hazards are identified and all necessary measures can be taken to protect workers from risks related to their work. Workers shall be informed of the risks associated with their work and the possible preventive actions.</p> <p>4.6.12. Working conditions shall be safe and all persons carrying out forestry work have been trained in health and safety.”</p> <p>Explanation provided by PEFC Poland</p> <p>“Working conditions are monitored by the State Forestry Inspectorate and the State Labor Inspectorate. The result of the inspection is a protocol with post-inspection recommendations and, finally, a re-inspection.</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>Important institutions in each forest district:</p> <ul style="list-style-type: none"> - social labor inspector - elected by employees - to him they can report problems; - employee in charge of occupational health and safety - ensures that employees are regularly trained, equipped with personal protective equipment, etc. <p>The social labour inspector is a person of public trust and is elected by the staff. All matters relating to the working conditions are reported to him/her.</p> <p>This is also a type of monitoring."</p>
9.2 Internal audit		
9.2.1 Objectives		
The standard requires that an internal audit programme at planned intervals shall provide information on whether the management system		
<p>a) conforms to</p> <ul style="list-style-type: none"> • the organisation's requirements for its management system; • the requirements of the national sustainable forest management standard 	YES	<p>PEFC EN 1004ver2:2023</p> <p>"4.7.2.1.1. The annual internal audit programme developed by the group entity shall provide information on whether the group management system:</p> <p>a) complies with the group organisation's own requirements for the group management system and with the requirements of the national group certification standard.</p> <p>c) conforms the requirements of the national sustainable forest management standard;"</p> <p>PEFC PL 1003ver2EN:2023</p> <p>"Annex 3: Individual forest Certification</p> <p>5.1 Objectives</p> <p>An internal audit programme at planned intervals shall provide information on whether the management system:</p> <p>a) conforms to</p> <ul style="list-style-type: none"> • the organisation's requirements for its management system; • the requirements of the national sustainable forest management standard"
<p>b) is effectively implemented and maintained.</p>	YES	<p>PEFC EN 1004ver2:2023</p> <p>"4.7.2.1.1. The annual internal audit programme developed by the group entity shall provide information on whether the group management system:</p> <p>d) has been effectively implemented and is effectively maintained."</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		PEFC PL 1003ver2EN:2023 “Annex 3: Individual forest Certification 5.1 (...) b) is effectively implemented and maintained.”
9.2.2 Organisation The standard requires that the organisation shall:		
a) plan, establish, implement and maintain an audit programme(s) including the frequency, methods, responsibilities, planning requirements and reporting, which shall take into consideration the importance of the processes concerned and the results of previous audits;	YES	PEFC EN 1004ver2:2023 “4.7.2.2. Organisation of internal audit The internal audit programme shall include at least: a) planning, establishing, implementing and maintaining the audit programme, including frequency, methods, responsibilities, planning and reporting requirements, taking into account the importance of these processes and the results of previous audits.” PEFC PL 1003ver2EN:2023 “Annex 3: Individual forest Certification 5.2 Organisation 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;”
b) define the audit criteria and scope for each audit;	YES	PEFC EN 1004ver2:2023 “4.7.2.2. (...) b) definition of criteria and scope of each audit.” PEFC PL 1003ver2EN:2023 “Annex 3: Individual forest Certification 5.2 (...) b) define the audit criteria and scope for each audit;”
c) select the auditors and conduct audits to ensure objectivity and the impartiality of the audit process;	YES	PEFC EN 1004ver2:2023 “4.7.2.2. (...) c) definition of the competence of the internal auditor (knowledge of the forest, knowledge of the standard). d) selection of auditors and conduct of audits so as to ensure the objectivity and impartiality of the audit process ; ”



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		PEFC PL 1003ver2EN:2023 "Annex 3: Individual forest Certification 5.2 (...) c) select the auditors and conduct audits to ensure objectivity and the impartiality of the audit process;"
d) ensure that the results of the audits are reported to relevant management;	YES	PEFC EN 1004ver2:2023 "4.7.2.2. (...) e) ensuring that the results of audits are communicated to the management of the group." PEFC PL 1003ver2EN:2023 "Annex 3: Individual forest Certification 5.2 (...) d) ensure that the results of the audits are reported to relevant management;"
e) retain documented information as evidence of the implementation of the audit programme and the audit results.	YES	PEFC EN 1004ver2:2023 "4.7.2.2. (...) f) keeping documented information as evidence of the implementation of the audit programme and its results." PEFC PL 1003ver2EN:2023 "Annex 3: Individual forest Certification 5.2 (...) e) retain documented information as evidence of the implementation of the audit programme and the audit results."
9.3 Management review		
9.3.1 The standard requires that an annual management review shall at least include		
a) the status of actions from previous management reviews;	YES	PEFC EN 1004ver2:2023 "4.7.4.1. The annual management review shall include as a minimum: a) the status of activities since the previous reviews." PEFC PL 1003ver2EN:2023 "Annex 3: Individual forest Certification 5.3.1 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 management system;	YES	PEFC EN 1004ver2:2023



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>"4.7.4.1. (...) b) developments in internal and external matters relevant to the group management system"</p> <p>PEFC PL 1003ver2EN:2023</p> <p>"Annex 3: Individual forest Certification</p> <p>5.3.1 (...) b) changes in external and internal issues that are relevant to the management system;"</p>
<p>c) information on the organisation's performance, including trends in:</p> <ul style="list-style-type: none"> • nonconformities and corrective actions; • monitoring and measurement results; • audit results; 	YES	<p>PEFC EN 1004ver2:2023</p> <p>"4.7.4.1. (...) d) information on the performance of the group organisation, including trends:</p> <ul style="list-style-type: none"> i. non-compliance and corrective action; ii. the results of monitoring and measurement; iii. the results of the audit" <p>PEFC PL 1003ver2EN:2023</p> <p>"Annex 3: Individual forest Certification</p> <p>5.3.1 (...) c) information on the organisation's performance, including trends in:</p> <ul style="list-style-type: none"> • nonconformities and corrective actions; • monitoring and measurement results; • audit results;"
d) opportunities for continual improvement	YES	<p>PEFC EN 1004ver2:2023</p> <p>"4.7.4.1. (...) e) opportunities for continuous improvement."</p> <p>PEFC PL 1003ver2EN:2023</p> <p>"Annex 3: Individual forest Certification</p> <p>5.3.1 (...) d) opportunities for continual improvement"</p>
9.3.2 The standard requires that the outputs of the management review shall include decisions related to continual improvement opportunities and any need for changes to the management system.	YES	<p>PEFC EN 1004ver2:2023</p> <p>"4.7.4.2. The results of the management system assessment shall include decisions on opportunities for continuous improvement and the need for any changes to the group management system."</p> <p>PEFC PL 1003ver2EN:2023</p> <p>"Annex 3: Individual forest Certification</p>

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		5.3.2 The outputs of the management review shall include decisions related to continual improvement opportunities and any need for changes to the management system.”
9.3.3 The standard requires that documented information as evidence of the results of management reviews shall be retained.	YES	PEFC EN 1004ver2:2023 “4.7.4.3. The group organisation shall keep documented information as evidence of the results of management reviews.” PEFC PL 1003ver2EN:2023 “Annex 3: Individual forest Certification 5.3.3 The documented information as evidence of the results of management reviews shall be retained.”
10. Improvement		
10.1 Nonconformity and corrective action		
10.1.1 The standard requires that when a nonconformity occurs, the organisation shall:		
a) react to the nonconformity and, as applicable: i. take action to control and correct it; ii. deal with the consequences;	YES	PEFC EN 1004ver2:2023 “5.1.1. In the event of non-compliance, the group organisation shall: a) respond to non-compliance and as appropriate: i. take steps to control and correct it; ii. deal with the consequences” PEFC PL 1003ver2EN:2023 “Annex 3: Individual forest Certification 6.1.1 When a nonconformity occurs, the organisation shall: a) react to the nonconformity and, as applicable: • take action to control and correct it; • deal with the consequences;”
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;	YES	PEFC EN 1004ver2:2023 “5.1.1. (...) (b) assess the need for action to eliminate the causes of the non-compliance so that it does not recur or occur elsewhere, by: i. overview of non-compliance; ii. identifying its causes;



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
iii. determining if similar nonconformities exist, or could potentially occur;		<p>iii. determining whether similar non-compliances exist or are likely to occur”</p> <p>PEFC PL 1003ver2EN:2023</p> <p>“Annex 3: Individual forest Certification</p> <p>6.1.1 (...) 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> <ul style="list-style-type: none"> • reviewing the nonconformity; • determining the causes of the nonconformity; • determining if similar nonconformities exist, or could potentially occur;”
c) implement any action needed;	YES	<p>PEFC EN 1004ver2:2023</p> <p>“5.1.1. (...) (c) implement the necessary actions”</p> <p>PEFC PL 1003ver2EN:2023</p> <p>“Annex 3: Individual forest Certification</p> <p>6.1.1 (...) c) implement any action needed;”</p>
d) review the effectiveness of any corrective action taken;	YES	<p>PEFC EN 1004ver2:2023</p> <p>“5.1.1. (...) (d) review the effectiveness of corrective action taken”</p> <p>PEFC PL 1003ver2EN:2023</p> <p>“Annex 3: Individual forest Certification</p> <p>6.1.1 (...) d) review the effectiveness of any corrective action taken;”</p>
e) make changes to the management system, if necessary.	YES	<p>PEFC EN 1004ver2:2023</p> <p>“5.1.1. (...) (e) if necessary, make the necessary changes to the group management system. ”</p> <p>PEFC PL 1003ver2EN:2023</p> <p>“Annex 3: Individual forest Certification</p> <p>6.1.1 (...) e) make changes to the management system, if necessary.”</p>
10.1.2 The standard requires that corrective actions shall be appropriate to the effects of the nonconformities encountered.	YES	<p>PEFC EN 1004ver2:2023</p> <p>“5.1.2. The corrective action taken shall be appropriate to the consequences of the non-compliance encountered. ”</p> <p>PEFC PL 1003ver2EN:2023</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>“Annex 3: Individual forest Certification</p> <p>6.1.2 Corrective actions shall be appropriate to the effects of the nonconformities encountered.”</p>
10.1.3 The standard requires that the organisation shall retain documented information as evidence of:		
a) the nature of the nonconformities and any subsequent actions taken;	YES	<p>PEFC EN 1004ver2:2023</p> <p>“5.1 Non-conformities and corrective actions</p> <p>5.1.3. The group organisation shall keep documented information as evidence:</p> <p>a) the nature of the non-compliance and the action taken as a result”</p> <p>PEFC PL 1003ver2EN:2023</p> <p>“Annex 3: Individual forest Certification</p> <p>6.1.3 The organisation shall retain documented information as evidence of:</p> <p>a) the nature of the nonconformities and any subsequent actions taken;”</p>
b) the results of any corrective action.	YES	<p>PEFC EN 1004ver2:2023</p> <p>“5.1.3 (...) b) the results of corrective actions. ”</p> <p>PEFC PL 1003ver2EN:2023</p> <p>“Annex 3: Individual forest Certification</p> <p>6.1.3 (...) b) the results of any corrective action.”</p>
<p>10.2 Continual improvement</p> <p>The standard requires that the suitability, adequacy and effectiveness of the sustainable forest management system and the sustainable management of the forest shall be continuously improved.</p>	YES	<p>PEFC EN 1004ver2:2023</p> <p>“5.2 Continuous improvement</p> <p>Sustainable forest management and group management system shall be continuously improved according to PEFC PL 1003 and PEFC PL 1004. ”</p> <p>PEFC PL 1003ver2EN:2023</p> <p>“Annex 3: Individual forest Certification</p> <p>6.2 Continual improvement</p> <p>The suitability, adequacy and effectiveness of the sustainable forest management system and the sustainable management of the forest shall be continuously improved.”</p>



Part IV: PEFC Checklist for Certification and Accreditation Procedures

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

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

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

No.	PEFC benchmark requirement		YES / NO	Reference to system documentation (including quotation of relevant text)
Certification Bodies				
1.	Does the scheme documentation require that certification shall be carried out by impartial, independent third parties that cannot be involved in the standard-setting process as governing or decision making body, or in the forest management and are independent of the certified entity?	Annex 6, 3.1	YES	PEFC PL 1002:2022 “5.1 Certification under the PEFC scheme shall be carried out by independent third parties who must not be involved in the standard setting process as management or decision making bodies or involved in forest management, and who are not affiliated with the organization applying for certification.”
2.	Does the scheme documentation require that certification body for forest management certification shall fulfil requirements defined in ISO 17021?	Annex 6, 3.1	YES	PEFC PL 1002:2022 “5.1 1) Certification bodies performing forest management certification shall meet the requirements defined in: a) PN-EN ISO/IEC 17021-1, if certification is carried out as a management system certification in the area of sustainable forest management;”
3.	Does the scheme documentation require that certification bodies carrying out forest certification shall have the technical competence in forest management on its economic, social and environmental impacts, and on the forest certification criteria?	Annex 6, 3.1	YES	PEFC PL 1002:2022 “5.1 3) Bodies performing forest management certification shall have appropriate competencies in assessing forest management operations, their economic, social and environmental conditions, and knowledge of forest certification criteria.”



No.	PEFC benchmark requirement		YES / NO	Reference to system documentation (including quotation of relevant text)
4.	Does the scheme documentation require that certification bodies shall have a good understanding of the national PEFC system against which they carry out forest management certification?	Annex 6, 3.1	YES	PEFC PL 1002:2022 “5.1 4) Certification bodies shall have a good understanding of the national PEFC certification scheme, depending on the field of operation (forest management certification or chain of custody certification).”
5.	Does the scheme documentation require that certification bodies have the responsibility to use competent auditors and who have adequate technical know-how on the certification process and issues related to forest management certification?	Annex 6, 3.2	YES	PEFC PL 1002:2022 “5.2 Certification bodies are responsible for recruiting competent auditors with the appropriate technical expertise in forest management or chain of custody issues appropriate to the certification activity. Forest management auditors shall meet the general criteria for quality and environmental management system auditors outlined in the PN-EN ISO 19011, PN-EN ISO/IEC 17021-3 and PN-EN ISO/IEC 17021-2.”
6.	Does the scheme documentation require that the auditors must fulfil the general criteria of ISO 19011 for Quality Management Systems auditors or for Environmental Management Systems auditors?	Annex 6, 3.2	YES	PEFC PL 1002:2022 “5.2 (...) Forest management auditors shall meet the general criteria for quality and environmental management system auditors outlined in the PN-EN ISO 19011, PN-EN ISO/IEC 17021-3 and PN-EN ISO/IEC 17021-2.”
7.	Does the scheme documentation include additional qualification requirements for auditors carrying out forest management audits? [*1]	Annex 6, 3.2	YES	PEFC PL 1002:2022 “5.1. 1) Certification bodies performing forest management certification shall meet the requirements defined in: b) requirements for bodies certifying management systems specified by the Polish Centre for Accreditation (PCA) in document DAC-18.” DAC-18: 2021 Accreditation of Management System Certification Bodies in the Area of Sustainable Forest management “W.7.1.2 The entity shall define competency criteria for each function in the SFM certification process. Criteria for auditors should include: a. Education: At least second degree in forestry and/or nature studies, attested by a diploma;

No.	PEFC benchmark requirement		YES / NO	Reference to system documentation (including quotation of relevant text)
				<p>b. Experience: at least five years' professional experience in forest management;</p> <p>c. Training: completion of a training course approved by the national body managing the PEFC system, attested by an appropriate certificate.</p> <p>The auditors should additionally demonstrate experience in conducting audits of management systems in accordance with PN-EN ISO 9001 or PN-EN ISO 14001. The confirmation of meeting this requirement is provided by documented evidence of conducting assessments in the number of at least 20 audit days."</p> <p><i>Other additional qualification requirements for auditors carrying out forest management audits were also found in DAC-18.</i></p>
Certification procedures				
8.	Does the scheme documentation require that certification bodies shall have established internal procedures for forest management certification?	Annex 6, 4	YES	<p>PEFC PL 1002:2022</p> <p>"6. Certification bodies shall have established internal procedures for forest management and chain of custody certification."</p>
9.	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	YES	<p>PEFC PL 1002:2022</p> <p>"6. (...) The applied certification procedures shall comply (as appropriate to the scope of work) with the requirements contained in the following documents:</p> <p>a) PN-EN ISO/IEC 17021-1, if certification is carried out as a management system certification in the area of sustainable forest management"</p>
10.	Does the scheme documentation require that applied auditing procedures shall fulfil or be compatible with the requirements of ISO 19011?	Annex 6, 4	YES	<p>PEFC PL 1002:2022</p> <p>"6. The applied auditing procedures shall meet or be consistent with the requirements of EN ISO 19011."</p>
11.	Does the scheme documentation require that certification body shall inform the relevant PEFC National Governing Body about all issued forest management certificates and changes concerning the validity and scope of these certificates?	Annex 6, 4	YES	<p>PEFC PL 1002:2022</p> <p>"6. In addition the certification bodies are obliged to:</p> <p>a) inform PEFC Poland of all forest management and chain of custody certificates issued and of all changes in the validity and scope of these certificates."</p>



No.	PEFC benchmark requirement		YES / NO	Reference to system documentation (including quotation of relevant text)
12.	Does the scheme documentation require that certification body shall carry out controls of PEFC logo usage if the certified entity is a PEFC logo user?	Annex 6, 4	YES	PEFC PL 1002:2022 “6. In addition the certification bodies are obliged to: b) audit the use of PEFC logo if the certified entity is a user of PEFC trademarks, in accordance with PEFC ST 2001.”
13.	Does a maximum period for surveillance audits defined by the scheme documentation not exceed more than one year?	Annex 6, 4	YES	PEFC PL 1002:2022 “6. The maximum cycle for surveillance audits is twelve months (...), for both forest management and chain of custody certification.”
14.	Does a maximum period for assessment audit not exceed five years for forest management certifications?	Annex 6, 4	YES	PEFC PL 1002:2022 “6. The maximum cycle (...) for reassessment audits five years, for both forest management and chain of custody certification.”
15.	Does the scheme documentation include requirements for public availability of certification report summaries?	Annex 6, 4	YES	PEFC PL 1002:2022 “6. Summaries of certification reports shall be publicly available.”
16.	Does the scheme documentation include requirements for usage of information from external parties as the audit evidence?	Annex 6, 4	YES	PEFC PL 1002:2022 “6. Evidence of compliance with forest management certification requirements shall (wherever possible) include relevant information also from external sources (government agencies, community organizations, local governments, etc.).”
17.	Does the scheme documentation include additional requirements for certification procedures? [*1]	Annex 6, 4	YES	PEFC PL 1002:2022 “6. The applied certification procedures shall comply (as appropriate to the scope of work) with the requirements contained in the following documents: The conformity of certification procedures with the above requirements shall be assessed by PCA during the accreditation and surveillance process, in accordance with provisions included in Chapter 7” <i>The procedures in DAC-18:2021 for the accreditation of management system certification bodies in the area of sustainable forest management further specify requirements for certification bodies, auditors, the audit, and certification.</i>
Accreditation procedures				

No.	PEFC benchmark requirement		YES / NO	Reference to system documentation (including quotation of relevant text)
18.	Does the scheme documentation require that certification bodies carrying out forest management certification shall be accredited by a national accreditation body?	Annex 6, 5	YES	PEFC PL 1002:2022 “8. The certification body carrying out forest management certification shall be accredited by the Polish Centre for Accreditation in order to ensure credibility of certification.”
19.	Does the scheme documentation require that an accredited certificate shall bear an accreditation symbol of the relevant accreditation body?	Annex 6, 5	YES	PEFC PL 1002:2022 “8. Information about accreditation, including accreditation number, accreditation symbol and name of accrediting body, shall be on each issued certificate.”
20.	Does the scheme documentation require that the accreditation shall be issued by an accreditation body which is a part of the International Accreditation Working Group (IAF) umbrella or a member of IAF’s special recognition regional groups and which implement procedures described in ISO 17011 and other documents recognised by the above mentioned organisations?	Annex 6, 5	YES	PEFC PL 1002:2022 “8. The accreditation shall be issued by an accreditation body which is a part of the International Accreditation Working Group (IAF) umbrella or a member of IAF’s special recognition regional groups and which implement procedures described in ISO 17011 and other documents recognised by the above mentioned organisations”
21.	Does the scheme documentation require that certification body undertake forest management certification as “accredited certification” based on ISO 17021 and the relevant forest management standard(s) shall be covered by the accreditation scope?	Annex 6, 5	YES	PEFC PL 1002:2022 “8. The certification body shall conduct forest management and chain of custody certification as accredited certification. The certification body carrying out forest management certification based on the PEFC PL 1003 shall be accredited based on the PN-EN ISO/IEC 17021-1 standard.”
22.	Does the scheme documentation include a mechanism for PEFC notification of certification bodies?	Annex 6, 6	YES	<i>PEFC PL 3001 is named “PEFC Notification of Certification Bodies operating Forest Management System and/or Chain of Custody Certification in Poland” and describes the mechanism for PEFC notification of certification bodies (including conditions, notification issuance procedures, obligations and validity).</i>

No.	PEFC benchmark requirement		YES / NO	Reference to system documentation (including quotation of relevant text)
23.	Are the procedures for PEFC notification of certification bodies non-discriminatory?	Annex 6, 6	YES	<p>PEFC PL 1002:2022</p> <p>“9. PEFC Poland shall not use these terms and conditions to discriminate certification bodies or to create obstacles for certification services market.”</p> <p><i>No discriminatory procedures are found in PEFC PL 3001.</i></p>

[*1] This is not an obligatory requirement

Annex 2 Results of stakeholder survey

The paragraphs below present the summarized results of the stakeholder survey conducted by the Assessor. The national stakeholder survey was held from 15 November to 30 November 2022. Form International sent out questionnaires to all stakeholders that were members of the Working Group (WG) for the Forest Management Standard, and additional stakeholders that were invited and/or participated in public consultation meetings during the scheme development process.

General

In total 13 stakeholders responded to the request to fill-out the questionnaire:

- 6 respondents who are forest owners
- 1 respondent from the scientific and technological community
- 6 respondents from other categories, e.g., the State Forests, the Polish Hunting Association

The response rate was 13 out of 93 (14%).

Participation in the process

In total 6 respondents participated as a member of the WG for the Forest Management Standard while one did as a consultant on procedural matters concerning certification, one participated in the PEFC Council Poland and one did not participate in the process as their certification body was not admitted to the Sustainable Forest Management Amendment (PSCL) process of the working group. 7 respondents participated in the first public consultation (November 2021 – January 2022).

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

- 3 respondents wanted to have the opportunity to discuss developments in relation to sustainable forest management;
- 2 respondents showed interest based on their profession and acknowledged the importance of the process of revision of the Forest Management Standard;
- 2 respondents indicated the need for adequate consideration of specific forest management activities, i.e., silvicultural and conservational aspects, fire protection and tourism management;
- 2 respondents wanted to have the opportunity to learn about current processes regarding the direction of change for forest management certification;
- 1 respondent indicated the need to change the vague indicators included in the previous standard;
- 1 respondent is a forest manager and therefore wanted to be involved in the process as it directly applies to the certification of his/her forest.

Respondents only reported a few concerns about the SFM standard:

- 1 respondent was concerned with the domination of the process by the State Forests (PGL Lasy Państwowe, shortened as PGL LP, which is the State Forests National Forest Holding);



- 1 respondent was concerned that the standard would introduce provisions that are incompatible with national legislation;
- 1 respondent was concerned with the lack of possibility of participation in the working group of organisations not directly or indirectly connected with PGL LP (e.g. certification bodies, recognised environmental NGOs, etc.);
- 1 respondent was concerned about the irresponsible introduction of climate policy ideology into the green economy, ignoring the needs and role of local communities and the country's population.

Of all respondents, one stated that the organizers of the standard revision process had not provided them with an opportunity to address their concern, as they were not admitted to the process for the amendment of sustainable forest management within the framework of the established working group. Another respondent declared that they did not get information on who applied for the working group and how the members of this group were selected. Others noted that they were given the opportunity to make their views known during the public consultation.

Of the 13 respondents, all respondents that were part of the WG (12) found that they were provided with relevant documents to participate in the scheme development, that the process had been transparent and that the necessary documents were well prepared and available on time.

Balanced representation of the Working Group

According to 9 respondents that participated in the process all relevant stakeholders were actively identified and invited to the process, one saying that 'the system is well known in Poland and anyone who wanted to participate in the work on the document had such an opportunity'. One respondent, however, reported a lack of identification and invitation of relevant stakeholders such as, PGL LP-independent environmental NGOs, certification bodies, etc. Three respondents said they do not know the list of invited organizations.

8 respondents stated that disadvantaged stakeholders and key stakeholders were proactively invited to the standard development process, while 4 respondents replied 'don't know'. One respondent had the same concern as before, stating that there was a lack of identification and invitation of certain relevant stakeholders.

10 respondents found that the WG had a balanced representation of the various stakeholder groups, whereby 1 respondent stated that the working group 'represented interests: social, natural and economic, with knowledge of forest management'. One respondent, however, found that conservation organizations were underrepresented as they did not want to take part in the WG and consultations but this deficiency was covered by the participation of scientists. They also found the State Forest employees to be overrepresented. Another respondent found the working group to be dominated by PGL LP employees representing their employer directly (e.g., RDSF or DGLP) or indirectly (e.g., Association of Forest Women). They stated that the WG 'does not include key NGOs independent of PGL LP, e.g. environmental NGOs and certification bodies'.



Most (10) respondents found that the WG had good representation from all areas of Poland, whereby 1 respondent commented that ‘the representatives of the Working Group represented important regions of the country, but that it should be noted that the knowledge held by the members in the field of forestry was broad and considered the regional conditions of forest management. This was often discussed at WG meetings’.

Complaints

None of the respondents indicated that there had been a complaint, with one respondent expressing his confidence in such information to have reached the members of the Working Group, ‘given the openness and transparency of the system’.

(Sensitive) issues indicated by respondents

Most of the respondents (11) indicated that there had been no sensitive issues in the assessment. 1 respondent, however, commented that the composition of the working group does not ensure impartiality in updating the PEFC standards. Another respondent stated that they ‘struggled with the under-representation of non-governmental organisations not associated with State Forests. Organisations rarely show interest in this type of work. More often they focus on criticising the adopted standards’.

The Working Group

The respondents that had been part of the WG (6) answered positively to the questions whether:

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

1 respondent commented that the discussions were substantive, open and transparent and that the Working Group discussed the comments point by point. 9 respondents stated that the decision of the WG was taken on the basis of consensus, whereby 1 respondent commented that the whole process was based on consensus, thanks to substantive discussions during the deliberations. 3 respondents stated that the WG has always reached consensus, due to group discussions.

Consequences to the overall assessment decision



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

Responses to specific comments and remarks

Issues raised by respondents to the stakeholder survey	Response of the Assessor Yes
<p>The composition of the working group for the revision of the PEFC standard does not include key NGOs independent of PGL LP, e.g. environmental NGOs and certification bodies. The working group is dominated by PGL LP employees representing their employer directly (e.g. RDSF or DGLP) or indirectly (e.g. Association of Forest Women).</p>	<p>The working group consisted of:</p> <ul style="list-style-type: none"> - 1 private forest company - 1 trade union - 1 economic chamber of wood industry - 6 associations (hunting, forestry, wood technologists, women, forestry headquarters, garden programme producers) - 2 from forest research institute - 3 from state forests <p>The working group indeed did not have certification bodies / accreditation bodies and apart from the associations no other NGO's (especially environmental).</p> <p>With regards to domination by PGL LP (State Forest): it is concluded that the working group, although having quite some representatives from the PGL LP, was not dominated, as various interests and stakeholders were present in the working group.</p> <p>With regards to certification bodies / accreditation bodies, it shall be noted that PEFC EN 1002 clause 5.1 stipulates that certification bodies "must not be involved in the standard setting process as management or decision making bodies". Although this does not prohibit certification bodies to participate in the standard revision process, PEFC Poland has apparently taken the decision to follow a strict application of this requirement. It shall further be noted that certification bodies are not identified as one of the nine major stakeholder groups as defined by Agenda 21 of the United Nations Conference on Environment and Development (UNCED), which is applied by PEFC Council as the guiding principle for identifying stakeholders. It is however understood that certification bodies (through their practical experience) could provide valuable contributions during a revision process. Any comments on the draft standards could have been submitted during the public consultation, for which stakeholders were invited (direct E-mailing and invitation on website) to submit comments.</p> <p>With regards to environmental NGO's, it is indeed noted that these were not part of the working group. It was explained to the Assessor (and confirmed by one of the respondents to the stakeholder survey) that NGOs were not willing to participate, despite invitations by PEFC Poland. This was solved by including scientists with environmental background (such as J. Koba from the Polish Forestry Society).</p>
<p>The composition of the working group does not ensure impartiality in updating the PEFC standards</p>	<p>It is unclear in what way the working group did not ensure impartiality. It shall be noted that the working group included key stakeholders, from different angles, which is in line with the requirements of PEFC Council. Furthermore, an open and transparent process was followed in which all stakeholders</p>



Issues raised by respondents to the stakeholder survey	Response of the Assessor Yes
	had the opportunity to participate and/or provide their input (through either the working group, or public consultation).
I did not get information on who applied for the working group and how the members of this group were selected	Based on PEFC PL 1001:2021 clause 5.1.10 such information should be made available when requested.



Stakeholders that were invited for the survey

This survey was sent to 93 stakeholders.

1. monika.dawidejt@storaenso.com;
2. ewa_referowska_chodak@sggw.edu.pl;
3. jaroslaw_oktaba@sggw.edu.pl;
4. jacek.koba5@gmail.com;
5. Damian.Zielinski@lasy.gov.pl;
6. z.stanula@stelmet.com;
7. a.frydel@pzlow.pl;
8. rs@pigpd.pl;
9. urban.kolman24@gmail.com;
10. kobietylasu@gmail.com;
11. andrzej.nowakowski@krosno.lasy.gov.pl;
12. anita.gilka@szczecinek.lasy.gov.pl;
13. anita465@wp.pl;
14. info@zielona-liga.pl;
15. kontakt@wwf.pl;
16. biuro@bocian.org.pl;
17. fundacja@naszaziemia.pl;
18. zg@lop.org.pl;
19. klubgaja@klub.gaja.pl;
20. fundacjaarka@fundacjaarka.pl;
21. poczta@pttk.pl;
22. fundacja@naszaziemia.pl;
23. pzlow@pzlow.pl;
24. fzpp@fzpp.pl;
25. sekretariat@ptop.org.pl;
26. sekretarz@splgoluchow.pl;
27. pzzl@pzzl.pl;
28. sekretariat@tpl.org.pl;
29. dwl@sggw.pl;
30. wles@ar.krakow.pl;
31. dziekles@up.poznan.pl;
32. joanna@zielonasiec.pl;
33. sabina.nowak@polskiwilk.org.pl;
34. biuro@salamandra.org.pl;
35. witciech@gmail.com;
36. sekretarz@splgoluchow.pl;
37. pzzl@pzzl.pl;
38. prezes@pzzl.pl;
39. adam.taras@op.pl;
40. sekretarz@pzzl.pl;
41. fundacja@poczta.onet.pl;
42. ciuchcianasza@vp.pl;
43. kancelaria@gdos.gov.pl;
44. sekretariat@ios.gov.pl;
45. przewodniczacy@zlpn.pl;
46. Departament.Lesnictwa.i.Ochrony.Przyrody@mos.gov.pl;
47. ciuchcianasza@vp.pl;
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71. rudka@bialystok.lasy.gov.pl;;
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73. zolradom@lasy.gov.pl;
74. RBijak@pcbc.gov.pl;
75. glos.lasu@cilp.lasy.pl;
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79. Michal.Zasada@wl.sggw.pl;
80. karaszewski@itd.poznan.pl;
81. urban.kolman24@gmail.com;
82. zlpwrp@lasy.gov.pl;



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- 87. sylwan@ibles.waw.pl;
- 88. maciej.skorupski@up.poznan.pl;
- 89. Zbigniew.Suchodolski@sgs.com;
- 90. spl@splgoluchow.pl;
- 91. krzysztof.wypij@bureauveritas.com;
- 92. anna.krzeminska@bureauveritas.com;
- 93. andrzej.kundzewicz@gmail.com



Questionnaire on the standard revision process of the sustainable forest management standard under the Estonian Forest Certification System (EFCS)

Question to stakeholder	Answer	Explanation / Remark
1. What stakeholder category do you represent?	<input type="checkbox"/> Forest owners <input type="checkbox"/> Business and industry <input type="checkbox"/> Non-government organisations (NGO); please specify: <input type="checkbox"/> Environmental <input type="checkbox"/> Social <input type="checkbox"/> Other: Click here to enter your comments <input type="checkbox"/> Scientific and technological community <input type="checkbox"/> Workers and trade unions <input type="checkbox"/> Other; please specify: Click here to enter your comments	Click here to enter your comments
2. Did you actively participate in the standard revision process of the sustainable forest management standard of the PFCS? (more than 1 answer possible) ► If no, why not?	<input type="checkbox"/> Yes, as a member of the Working Group for the Forest Management Standard <input type="checkbox"/> Yes, I participated in the public consultation (November 2021 – January 2022) <input type="checkbox"/> Yes, namely: Click here to enter your comments <input type="checkbox"/> No, because: Click here to enter your comments	Click here to enter your comments
3. What was your main interest to participate in the standard revision process of the PFCS System?	Interest: Click here to enter your comments	Click here to enter your comments
4. What, if any, was your main concern(s) regarding the Sustainable Forest Management (SFM) standard of the PFCS System?	Concern: Click here to enter your comments	Click here to enter your comments



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



Question to stakeholder	Answer	Explanation / Remark
11. a) Are you aware if any substantive and/or process complaints and appeals relating to the standard revision process were formally submitted to PEFC Poland, by you or any other stakeholder?	<input type="checkbox"/> Yes, there was a formal complaint / appeal about Click here to enter your comments <input type="checkbox"/> No <input type="checkbox"/> I don't know	Click here to enter your comments
b) In case of any complaints, have these complaints and appeals been validated , impartially and objectively evaluated , and is the decision communicated to the complainant?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> I don't know	Click here to enter your comments
12. Should we be aware of certain (sensitive) issues in our assessment of the PFCS System?	<input type="checkbox"/> Yes (please specify) Click here to enter your comments <input type="checkbox"/> No <input type="checkbox"/> I don't know	Click here to enter your comments

Questions 13-19 are for Working Group members (Forest management) only.

If you did participate in the Working Group for the revision of the Forest Management standard, please continue with **question 13**.

Question to stakeholder	Answer	Explanation / Remark
13. Did the Working Group include stakeholders 1) with expertise relevant to the subject matter of the standard, 2) those affected by the standard, and 3) those that can influence implementation of the standard ?	<input type="checkbox"/> Yes <input type="checkbox"/> No, please provide an explanation: Click here to enter your comments <input type="checkbox"/> I don't know	Click here to enter your comments
14. Did you receive invitations and documents for Working Group meetings in a timely manner ?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> I don't know	Click here to enter your comments
15. Have all working draft documents (draft versions of the standard) been available to all members of the Working Group?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> I don't know	Click here to enter your comments

Question to stakeholder	Answer	Explanation / Remark
16. Have you been provided with meaningful opportunities to contribute to the development or revision of the standard and to provide feedback on the working drafts?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> I don't know	Click here to enter your comments
17. Have feedback and views submitted by any member of the Working Group been considered in an open and transparent way where the outcome of these considerations is recorded?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> I don't know	Click here to enter your comments
18. Has all feedback received during the public consultation been considered in an objective manner by the Working Group?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> I don't know	Click here to enter your comments
19. Was the decision of the Working Group to recommend the final draft for formal approval taken on the basis of consensus ? Consensus does not necessarily mean unanimity, as long as there was no sustained opposition to a substantial issue.	<input type="checkbox"/> Yes <input type="checkbox"/> No, the issue was resolved in the following way: Click here to enter your comments <input type="checkbox"/> I don't know	Click here to enter your comments
20. In case no consensus was reached by the Working Group on certain issues, were these issues resolved and in which way?	<input type="checkbox"/> Yes, the issue(s) was resolved in the following way: Click here to enter your comments <input type="checkbox"/> No (please explain): Click here to enter your comments	Click here to enter your comments

Please return the answers latest by 30th of November 2022. You can direct your response by E-mail to: info@forminternational.nl

Thank you for your time and cooperation.



Annex 3 Results of international consultation

No comments were received during the International Consultation.



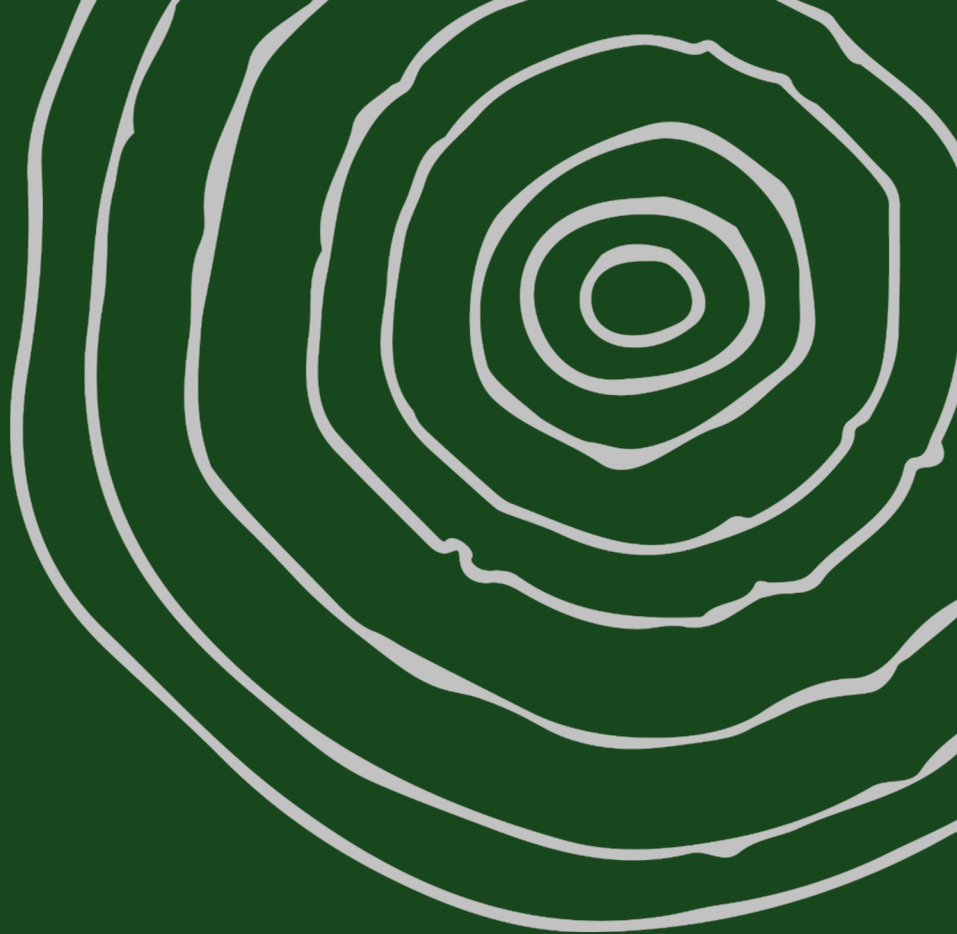
Annex 4 Report on the field assessment

Not applicable as no field visit was conducted.

Annex 5 Internal review

Report chapter / Page	Assessor's report statement	PEFCC's Internal Review comment	Assessor's response
7.2 Non-conformities in the Forest management standard Related to Clause 4.1.10 of PEFC PL 1003:EN	None	<p>It is not clear, whether the conversion here applies for plantations or not. The conversion definition covers it, but the plantation definition does not define, whether or not plantations are considered within the forest land use or it is separate. Please consider this aspect in the assessment report.</p> <p>In case the plantations are covered by this, the cut off date is applicable and "A" verification should be updated as well.</p>	Adjusted accordingly, a non-conformity is raised.





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