

PEFC Conformity Assessment

Estonian Forest Certification Scheme

March, 2023



Client

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Date of document	21 March 2023



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	11
2. Recommendation	12
3. Summary of the findings	13
4. Structure of the scheme	15
4.1 Introduction to the forestry sector in Estonia	15
4.2 Organisation of the Scheme	16
4.3 The EFCS	18
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	21
7. Forest Management Standard	24
7.1 Analysis	24
7.2 Nonconformities	26
8. Group Certification Model	29
8.1 Analysis	29
8.2 Nonconformities	29
9. Chain of Custody Standard	33
10. Certification and accreditation arrangements	34
10.1 Analysis	34
10.2 Nonconformities	34
11. Other aspects	35
Annex 1 PEFC Checklists	36



<i>Part I: PEFC Checklist for Standard-setting Procedures and process</i>	36
<i>Part II: PEFC Checklist for Group Forest Management Certification</i>	85
<i>Part III: PEFC Checklist for Sustainable Forest Management</i>	112
<i>Part IV: PEFC Checklist for Certification and Accreditation Procedures</i>	153
Annex 2 Results of stakeholder survey	161
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
EFCC	Estonian Forest Certification Council
EFCS	Estonian Forest Certification Scheme
EMSN	MTÜ Eesti Metsasertifitseerimise Nõukogu (<i>Estonian Forest Certification Council</i>)
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

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 Estonian Forest Certification Scheme (EFCS) 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 EFCS.

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, Ms. Anke Scheper, and Ms. Robyn Jansma (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 EFCS 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 the Estonian Forest Certification Council (EFCC) are shown in Table 1. Table 2 lists the documents used from PEFC Council. Besides these documents, the website used by The EFCC was consulted during the assessment.

Table 1 Documents used for the conformity assessment

Document number	Document name
PEFC EST 1004:2022	Requirements for certification bodies operating PEFC forest management certification
PEFC EGD 1005:2022	Issuance of PEFC trademarks use licenses by the Estonian Forest Certification Council
PEFC EGD 1006:2022	EFCC Notification of Certification Bodies operating Chain of Custody and Forest Management Certification in Estonia against the requirements of the Estonian Forest Certification Scheme
PEFC EGD 1007:2022	Complaints and Appeals Settlement Procedure
PEFC EST 1002:2022	Group Forest Management Certification – Requirements (amended version of 18-01-2023)
PEFC EST 1003:2022	PEFC Estonia Sustainable Forest Management Standard (amended version of 13-01-2023)
PEFC EST 1001:2020	Standard setting – Requirements (amended version of 09-02-2023)
PEFC ST 2001:2020	PEFC Trademarks Rules - Requirements
PEFC ST 2002:2020	Chain of Custody of Forest and Tree Based Products – Requirements
PEFC ST 2003:2020	Requirements for Certification Bodies operating Certification against the PEFC International Chain of Custody Standard
(none)	Development report
(none)	Documents providing evidence of the revision process, such as: <ul style="list-style-type: none"> • Comments from consultation • Stakeholder mapping and meetings • Work group meetings • Public consultation • Stakeholder feedback
(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
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 EFCS 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 EFCS 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 the EFCC, 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 the EFCC during the standard-setting process.

2. Assessment of the Sustainable Forest Management standard

The compliance of the EFCS 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 EFCS 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 EFCS 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 EFCS 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 EFCS were evaluated on the basis of descriptions and information obtained in correspondence with the EFCC 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 16 August to 13 October 2022. No comments were received (Annex 3).

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 for the Forest Management Standard, and additional stakeholders that were invited and/or participated in public consultation meetings during the revision process. In total 40 questionnaires were sent out, 8 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 EFCS 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 the EFCC.

3. Elaboration of draft report

The draft report was sent to the EFCC and PEFC Council Secretariat on 22 December 2022.

4. Commenting period

Based on the draft report, the EFCC provided 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 10 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 on 21 March 2023.

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 EFCC															
5. Field visit **															
6. Elaboration of final draft report															



Week	1	2	3	4	5	6	7*	8	9	10	11	12	13	14	15
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 of the EFCS
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 Estonian Forest Certification Scheme**, on the condition that the six (6) remaining nonconformities shall be corrected within six (6) months after endorsement.

The remaining nonconformities found in the Scheme documentation:

- Three (3) in the Forest Management Standard
- Three (3) in the Group Certification Model

All nonconformities are classified as minor. In relation to the standard-setting process, three (3) 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's recommended that two (2) nonconformities, related to PEFC ST 1001:2017 5.3.2 and 8.2.1, are addressed within six (6) months after endorsement.



3. Summary of the findings

The table below presents a summary of the assessment findings. Ninety-three (93) 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 EST 1001:2020	None	Well-developed procedures with elaborate requirements. Corrective actions required for remaining nonconformities.	Yes
Standard-setting process	Process documentation, including invitations, minutes, websites etc.	3 minors	Well implemented process with clear and transparent documentation. Additional evidence might be provided to solve the nonconformities.	No
Forest Management Standard	PEFC EST 1003:2022	3 minors	Well-developed standard, with elaborate requirements. Corrective actions required for remaining nonconformities.	No
Group Certification Model	PEFC EST 1002:2022	3 minors	Well-developed standard. Corrective actions required for remaining nonconformities.	No
Chain of Custody Standard	PEFC ST 2002:2020	None	PEFC ST 2002:2020 is adopted	Yes
Forest Management certification and accreditation arrangements	PEFC EST 1004:2022	None	Scheme documentation includes 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 Estonia

With over half (± 2.3 million hectares) of its land area covered by forest, Estonia is one of the most heavily forested countries in Europe. Its forest land area has increased by a factor 1.5 in the last 70 years, partly by natural afforestation of meadows and pastures. This has resulted in formation of deciduous and mixed stands, as well as pine and spruce have that have spread on former arable land. The total growing stock was around 480 million m³ in 2021. The forest cover is lowest in the central provinces and highest on the Western islands (figure 1).¹²³

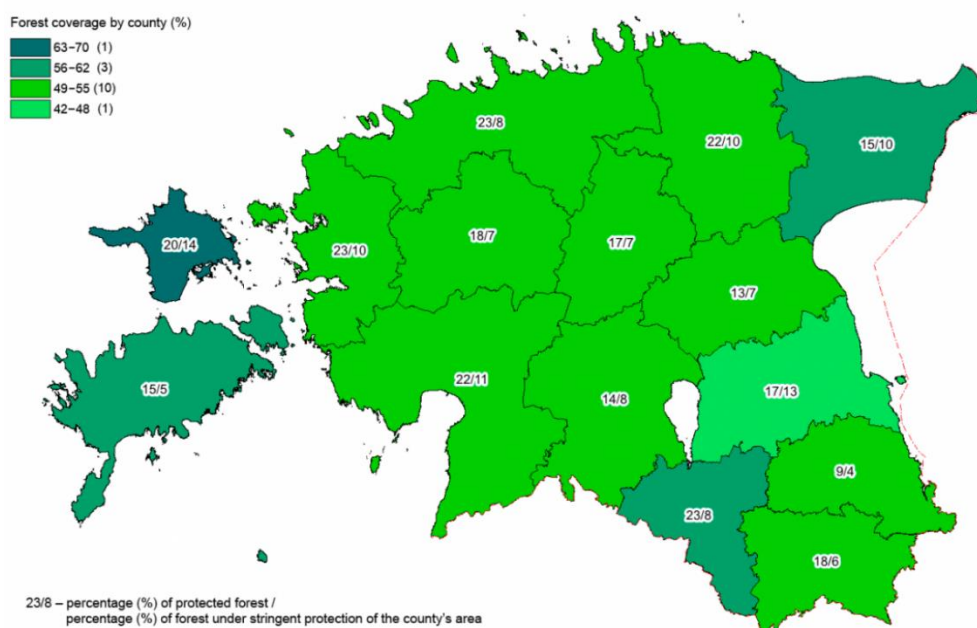


Figure 1: Forest Cover in Estonia per province (derived from Republic of Estonia – Environment Agency)⁴

Estonia belongs primarily to the northern area of the nemoral-coniferous or „mixed forest” belt. Of all the woodlands, 51% of stands are dominated by deciduous species and 49% by coniferous species, making landscapes very diverse.⁵ The forest cover comprises mostly semi-natural forests with the most common tree species being pine (32%), birch (30%) and spruce (19%) by area.⁶ Historically Estonian forests are of natural structure and managed forests may include some indicators of "primary" or "old-growth" forests. The age structure between forests in Estonia is

¹ Republic of Estonia Ministry of Environment, n.d., retrieved November 22, 2022, from <https://envir.ee/en/water-forest-resources/forestry>

² Erametsakeskus, n.d., Retrieved November 22, 2022, from <https://www.eramets.ee/forests-in-estonia/>

³ Statistics Estonia, 2021. Environment – forests. Derived November 22, 2022, from <https://www.stat.ee/en/find-statistics/statistics-theme/environment/forest>

⁴ <https://keskkonnaagentuur.ee/en/estonian-environmental-indicators/estonian-environmental-indicators/wildlife-and-forest#forests>

⁵ Erametsakeskus, n.d., Retrieved November 22, 2022, from <https://www.eramets.ee/forests-in-estonia>.

⁶ CEFP (Confederation of European Forest Owners), n.d. Retrieved November 22, 2022, from <https://www.cepf-eu.org/page/estonia>



uneven - approximately 27% of forests are younger than 30 years, about 40% of forest stands are over 60 years old, and 7% of the forest stands are older than 100 years.⁷

The Estonian forests have 0,57 million hectares (24,6%) of protected forest, of which 0,3 million hectares (13,2%) is strictly protected. Approximately 75%, that is, 1.7 million hectares, is managed forest.⁸ In 1991 the Estonian state decided to launch the land restitution process, aiming to give back the land to private hands and restore the properties as they were in 1918. By the end of 2015 approximately 1,1 million hectares (47% of the total forest surface) are owned by family or private forest owners (physical and legal entities), with altogether approximately 100,000 people managing holdings with an average size of about 10 hectares. The total privately owned growing stock is around 275 million m³.⁹

Roughly 45% of Estonian forests, that is about 1 million hectares, now still belongs to the Estonian state. These forests are maintained, grown, and managed by the State Forest Management Centre (RMK).¹⁰ The operating area of forest management includes 18 forest districts, each managed by a forester, the Silviculture Department, the Forest Administration Division, the Nature Protection Department, the Forestry Improvement Department, the Hunting Department, and the Land Management Division. In addition to the PEFC certificate, RMK holds two certificates – ISO 14001 environmental management certificate and FSC forestry certificate.

The role of forestry in the economy and social life is extremely important: the sectors direct, indirect, and induced contribution to the GDP is around 10%. Wood and wood-based products are an important part of the trade and the country's export products. These export products are predominantly comprised of higher value wood products, such as for wooden houses.¹¹

4.2 Organisation of the Scheme

In 2001 the Estonian Forest Certification Council (EFCC) was established by initiation of Estonian private forest owners and participation of other relevant stakeholders. The aim of the association was to “contribute to the implementation of the principles of sustainable forest management in Estonia”, therewith ensuring compliance with PEFC principles in forest management, to “provide the purchaser of timber, wood and wood-based products with assurance that the wood comes from sustainably managed forests and the origin of PEFC-labelled wood and wood products can be verified at every stage of the supply chain”, and to “raise awareness of sustainable forestry through

⁷ Republic of Estonia Ministry of Environment, n.d., retrieved November 22, 2022, from <https://envir.ee/en/water-forest-resources/forestry>

⁸ Republic of Estonia Ministry of Environment, n.d., retrieved November 22, 2022, from <https://envir.ee/en/water-forest-resources/forestry>

⁹ CEPF (Confederation of European Forest Owners), n.d. Retrieved November 22, 2022, from <https://www.cepf-eu.org/page/estonia>; Erametsakeskus, n.d., Retrieved November 22, 2022, from <https://www.eramets.ee/forests-in-estonia/>.

¹⁰ See: <https://www.rm.ee/organisation/operating-areas>

¹¹ Republic of Estonia Ministry of Environment, n.d., retrieved November 22, 2022, from <https://envir.ee/en/water-forest-resources/forestry>



its activities”, for which purpose it organizes clarification and information work, trainings, conferences, prepares and publishes publications, etc.¹²

EFCC gained PEFC membership in November 2002, the first Estonian PEFC scheme was endorsed in 2008, and the system was re-endorsed in 2015. The current revision of the scheme was started in 2019. There is currently more than 1.3 million hectares of PEFC certified forest in Estonia. This certified forest area is mostly family- and community-owned who acquired PEFC certification through group certification. At the end of 2015 approximately 10% of all private forest owners are members of local private forest owners’ associations.

The EFCC is the national administrative body responsible for managing the Estonian Forest Certification Scheme and keeping it current with PEFC requirements. Membership of the EFCC is voluntary, and any legal person who is guided by the principles of sustainable forestry, willing to contribute to the achievement of the Association’s goal and supportive of the principles of PEFC may apply for membership of the Association.¹³

The EFCC’s governing bodies are:

- The General Meeting (GM) is the EFCC’s supreme body and consists of all members of the association. It has the mandate to take decisions on issues concerning the activities of the entire association, which are not assigned to the board of directors
- The Board has between three and twelve members elected by the GM and is responsible for managing the activities of the Association between general meetings

The Council’s principal tasks are the following :

- Operate as the official representative of PEFC Estonia
- Support and promote sustainable forest management through the program of PEFC
- Oversee certification and accreditation of certification bodies
- Grant rights for the use of the PEFC logo
- Archive all relevant PEFC Estonia and EFCS documents
- Oversee EFCS standard setting and standard revision
- Oversee the dispute resolution process

Depending on the need to address various tasks and issues, the EFCC sets up standing or ad hoc Working Groups. Two working groups were formed for the elaboration of certification mode I: one for developing the standard for sustainable forest management and for certification procedure requirements, and one for the chain of custody standard implementation.

¹² Derived from the Development Report and the Estonian Forest Certification Council Statute

¹³ Derived from the Estonian Forest Certification Council Statute



4.3 The EFCS

The EFCC 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 EFCS 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 EST 1003:2022 PEFC Estonia Sustainable Forest Management Standard	PEFC EST 1004:2022 Requirements for certification bodies operating PEFC forest management certification	Development report
PEFC EST 1002:2022 Group Forest Management Certification – Requirements	PEFC ST 2003:2020 Requirements for Certification Bodies operating Certification against the PEFC International Chain of Custody Standard	PEFC EST 1001:2020 Standard setting - Requirements
PEFC ST 2002:2020 Chain of Custody of Forest and Tree Based Products – Requirements	PEFC EGD 1006:2022 EFCC Notification of Certification Bodies operating Chain of Custody and Forest Management Certification in Estonia against the requirements of the Estonian Forest Certification Scheme	PEFC EGD 1005:2022 Issuance of PEFC trademarks use licenses by the Estonian Forest Certification Council
PEFC ST 2001:2020 PEFC Trademarks Rules – Requirements		PEFC EGD 1007:2022 Complaints and Appeals Settlement Procedure



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 EST 1001:2020 Standard setting – Requirements. The document is clearly structured and is similar in structure and content to the PEFC ST 1001:2017 benchmark standard. The procedures are well developed and clearly described and largely follow the structure of the PEFC international benchmark standard.

5.2 Nonconformities

There are no non-conformities found in the standard setting procedures.



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 October 2019. In January 2020 a public announcement of the revision of the scheme was made. A working group was installed in March 2020, which held a total of 32 meetings from March 2020 to June 2022 to prepare a preliminary draft for public consultation. The public consultation was held from October to December 2021. Additional public consultation and pilot testing was done for Trees outside Forests requirements, which is however beyond the scope of the current assessment as it is no longer part of the current EFCS scheme. Following its procedures, EFCC created a steering group, consisting of two members of each stakeholder group, to make a final decision on consensus. Consensus on the final draft was reached in April 2022, after which the documents were approved in May 2022. A few minor amendments were made in June 2022, followed by consensus and formal approval by EFCCs board and general meeting.

The standard setting process was implemented almost entirely according to the standard setting procedures of the EFCS. The process is generally well-implemented and clearly and elaborately documented. It also has a high level of transparency resulting from the large number of documents publicly available on the EFCC website.

A point that came forward during the assessment was the no-vote of one of the members of the steering group on the final voting for the approval of the standard. The steering group consisted of two members of each stakeholder group from the general working group, and was tasked with voting to approve the final version of the standard. During the voting, 10 out of 11 votes were in favour of implementing the standard but one NGO member voted against the final version of the standard. Despite substantial efforts from EFCC to enter into discussions with this member and to get this member to join the meeting to explain its point of view, the member did not do so. EFCC explained that the other NGO members of the working group were in favour of adopting the standard and that the NGO stakeholder group as a whole had no sustained opposition. EFCC therefore concludes that no sustained opposition remained. The assessor concluded that considering the efforts made by EFCC to resolve the issue, their efforts to get into contact with the member for discussions and to include its suggestions, and the fact that this viewpoint was not shared by other NGOs, the no-vote is not considered sustained opposition and consensus was reached within the steering group.



6.2 Nonconformities

There are three (3) non-conformities 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.

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

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
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	<p>Decision of the Board 20-01-2020 (Translated by Google Translate)</p> <p>“PROCEDURE FOR COLLECTING OPINIONS ABOUT THE STANDARDS OF THE ESTONIAN FOREST CERTIFICATION COUNCIL AND HANDLING RECEIVED OPINIONS</p> <p>2. Opinions and suggestions about standards can be submitted to EMSN in writing at Toompuiestee 24, 10149 Tallinn or by e-mail at info@pefc.ee.”</p> <p>Explanation provided by EFCC</p> <p>“(…) the general contact form and the CEO's contacts can be easily found on the homepage of the EMSN homepage under the main menu "Contact". EMSN's contacts have been available to all interest groups through letters, public announcements and letters asking for feedback, as well as through articles published in major portals.</p> <p>For the sake of clarity and transparency, an additional option for submitting requests, complaints, etc to the scheme updating block on the homepage regarding the standard-setting process will be added.”</p> <p>Assessor: <i>A document containing the procedure for collecting opinions on the standards of the Estonian Forest Certification Council and handling received opinions (translated with Google translate) was found including a post address and an email address as contact points. Although this general contact point is available on the website of EFCC, no instruction is provided that this is the contact point that can be accessed for enquiries, complains and appeals. However, EFCC has noted that that this will be added.</i></p>
6.3.1 The announcement and invitation shall include:	NO	<p>Public Announcement 30 January 2020 found on the website of EFCC (translated with Google Translate)</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
(e) explicit invitation and clear instruction on how to submit feedback on the scope and standard-setting process,		<p>"We also ask for your opinion and feedback on the scope of the standard and the procedures for preparing the standard. The relevant documents are the following: <u>Scope of the Standard and Compilation of the Standard requirements</u>. We ask for your feedback no later than February 20, 2020 at eve.rebane@pefc.ee."</p> <p>Explanation provided by EFCC</p> <p>"It is a specifics of the language. We have asked for feedback on the standard-setting procedures. Since the procedure is a description of the process described in PEFC EST 1001, and since the standard-setting procedure is based on this standard, we have asked for feedback on the standard-setting process on the basis of the established requirements (because the standard-setting process is described in the standard "Standard setting - Requirements")."</p> <p><i>Although the public announcement contains a request to stakeholders to comment on the scope of the standard, no explicit instruction was made that stakeholders could submit feedback on the standard setting process.</i></p> <p>Assessor: <i>Although the public announcement contains a request to stakeholders to comment on the scope of the standard, no explicit instruction was made that stakeholders could submit feedback on the standard setting process.</i></p>
8.2.1 The standardising body shall establish and maintain a permanent mechanism for collecting and recording feedback on a standard. This mechanism shall be accessible on the website of the standardising body and/or PEFC National Governing Body with clear directions for providing feedback.	NO	<p>Decision of the Board 20-01-2020 (Translated by Google Translate)</p> <p>"PROCEDURE FOR COLLECTING OPINIONS ABOUT THE STANDARDS OF THE ESTONIAN FOREST CERTIFICATION COUNCIL AND HANDLING RECEIVED OPINIONS</p> <ol style="list-style-type: none"> 1. Opinions received through all possible channels, including meetings, training courses, etc., are collected, recorded and analyzed in the preparation of the standard. 2. Opinions and suggestions about standards can be submitted to EMSN in writing at Toompuiestee 24, 10149 Tallinn or by e-mail at info@pefc.ee. 3. EMSN confirms receipt of the opinion by sending a confirmation e-mail to the sender of the opinion. 4. EMSN keeps a record of the received opinions on each standard of the Estonian Forest Certification Scheme in a separate document. 5. Received opinions are gathered and analyzed. 6. Received opinions are discussed at the board meeting, standards working groups and the standard's steering group. 7. EMSN provides feedback on the opinion to the sender of the opinion." <p>Feedback page on the EFCC website: Thank you for contacting us.</p> <p>"Eesti Metsasertifitseerimise Nõukogu MTÜ</p> <p>Registrikood: 80157862</p> <p>info@pefc.ee</p> <p>+372 529 7807</p> <p>Toompuiestee 24, 10149 Tallinn, Eesti"</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>Explanation provided by EFCC</p> <p>“For the sake of clarity and transparency, we intend to complement the scheme documents block on the homepage with instructions and an additional opportunity to express an opinion on the standard-setting procedure. https://pefc.ee/avasta-pefc/pefc-skeemi-dokumendid/”</p> <p>Assessor: <i>A mechanism for collecting feedback was found in the decision of the board meeting. However, it seems that this information is not easily found on the website of EFCC and it is therefore unclear to stakeholders which methods they have to provide feedback. Although a general contact form is found on the EFCC website, there are no clear directions provided on how stakeholders can provide feedback, such as complaints, requests for clarifications etc. EFCC has commented that they intend to add this.</i></p>



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 EST 1003:2022 — PEFC Estonia Sustainable Forest Management Standard. The standard is structured in different sections, largely following ISO 14001 structure. Section 8 further defines sustainability criteria which are based on the six PEFC benchmark sustainability criteria:

- Criterion 1: Maintenance and appropriate enhancement of forest and its ecosystem services considering the contribution of the forest to the carbon cycle
- Criterion 2. Activities aiming at the maintenance of forest ecosystem integrity, viability and ecological functionality
- Criterion 3. Maintenance or enhancement of the productivity of timber, non-wood products and other key ecosystem services
- Criterion 4. Maintenance, conservation, and appropriate enhancement of biological diversity in forest
- Criterion 5. Maintaining and enhancing the role of the forest as an ecosystem regulating the environment
- Criterion 6. Maintenance or appropriate enhancement of the cultural and socio-economic ecosystem services of the forest

In addition, the standard includes two Annexes: specifications for plantations (Annex 1) and a list of applicable legislation (Annex 2). It is noted that the interpretations found in Annex are also found in notes within the standard. It shall be noted that no specific requirements are developed for Trees outside Forests (TOF).

Forest is defined as *“an ecosystem consisting of forest land, its flora, fauna and micro-organisms”* and forest land is defined as *“land entered in the land cadastral register as a forest land parcel or a plot of land with an area of at least 0.1 ha and woody plants with the height of at least 1.3 metres and with the canopy density of at least 30 per cent and those areas of forest and/or shrubs complying with the requirements of the structure of forest land which, however, cannot be classified as forest land pursuant to the Forest Act (eg: plantations, shrubs, wooded meadows, wooded bogs, parks, arboretums, permanent grasslands with wooded plants (Forest Act and ST Working Group))”* Plantation is defined as *“a site established on non-forest land where trees and shrubs are grown with regular planting spacing and managed uniformly by age”*. These definitions are based on the Forest Act. It shall be noted that the Forest Act does not apply to plantations. Clear-cut areas regenerated with native tree species and afforested non-forest land (e.g. quarries, agricultural land) are not deemed to be plantations, unless the organization has defined afforested non-forest land as a plantation. It is furthermore noted that clause 4.1.3 a requires that all forest



land owned and/or held by the organization shall be covered by the certificate; only covering part of the forest area is not allowed. This does however not apply to areas not defined as forest by the Forest Act, but covered by trees and/or shrubs as listed above. For such areas, the organization is allowed to only include a part of the area for certification.

The standard covers requirements for the management of forests and plantations. Previously, the standard included specifications for large and small forest owners, but one of the outcomes of the standard-setting was to no longer use this deviation in the current revised standard. Requirements therefore apply to all forest owners, regardless their forest size. Furthermore, the standard applies to forest owners and managers, as well as their contractors operating in certified areas.

It is explained in the standard that Estonian forests are very different, diverse in terms of structure and site type, as well as in terms of objectives and practices of forest management. The introduction states that *“the standard establishes common requirements; however, the specific character of forest land ownership (size, location, forest management objectives, applied practices and the intensity of forest use) has been taken into account in the development of the standard.”* Next to criteria, normative indicators are formulated, which *“determine the minimum required activities demonstrating the compliance with the requirements and ensuring the effectiveness of the activities”*. Due to its normative character, these are regularly cited to provide evidence of conformity.

It is noted that the introduction also states that *“if PEFC standard does not require a written record to demonstrate the compliance with the requirement, the organization may provide oral verification”*. Special attention is paid to requirements related to documented information.

With regards to conversion it is noted that the conversion of 1) native forest, 2) ecologically valuable non-forest land, and 3) heritage landscapes to plantation forest is not at all possible, not even under certain conditions.

The standard is quite well developed and clearly structured. Although textually the standard is largely similar to the PEFC benchmark standard, in many cases the standard further specifies the general requirement with sometimes detailed requirements or descriptions, especially in the indicators, for instance in clause 8.4.7:

“The techniques contributing to maintaining, improving, recovering or restoring the ecological spatio-temporal coherence of the forest shall be preferred in forest management work. (...)

Indicators: the organization has used necessary methods of work, as a result, there are structures and characteristics ensuring the ecological spatio-temporal coherence of the forest in the audited entity, eg retention trees of different species, groups of retention trees with the second layer and/or undergrowth; wood of different decomposition state (eg standing and lying dead trees, decomposed wood, stumps); buffer strips have been left; forest microstructures, forest of different composition and age, natural growth and diversity of undergrowth, as well as birds, animals, plants, mosses, lichens, fungi, etc of significant importance indicating the biological state and diversity of the forest have been preserved.



Single retention trees or groups of retention trees have been left in the clear-cut area of 3 ha to ensure coherence; in case of areas over 3 ha groups of retention trees have been preferred.

At least twice as many retention trees as required in the commercial forest have been left at the known site of category I and II species in the protected natural object. Trees and shrubs providing nectar and pollen are located mainly on the open edges of the felling sites (eg roads, division lines between compartments, ditches, shores of water bodies) or at least half of the canopy of these trees and bushes is exposed to light to enable them to develop blossoms."

The standard is easy to follow and due to the indicators it is often quite clear what shall be the minimum performance to meet the requirement. The following observations¹⁴ are made:

- Clause 8.1.3: it is noted that "significant carbon stock" is not further defined and might therefore be difficult to assess, unless this is further defined at national level;
- Clause 8.1.4: it is noted that "great carbon sequestration" is not further defined and might therefore be difficult to assess, unless this is further defined at national level.

7.2 Nonconformities

There are three (3) 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.

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)
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	NO	<p>PEFC EST 1003:2022</p> <p>"8.2.5. The organization shall not take litter into the forest and the spillage of oil and fuel shall be prevented during forest management work. The organization and/or contractor shall have preparedness for the prevention and elimination of the spillage of oil and fuel and littering. The organization shall develop measures for avoiding accidental littering. Inorganic waste and litter are collected and disposed of in an environmentally sustainable manner."</p> <p><i>The wording "during forest management work" limits this requirement for forest operations, but the requirement is generally applicable for the certified forest.</i></p>

¹⁴ 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)
from the accidental spillage shall be in place.		
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.	NO	<p>PEFC EST 1003:2022</p> <p>“8.2.11 Only organic fertilizers, natural mineral fertilizers, natural soil improvers, biostimulants and bioregulators can be used on forest land, unless prohibited by national legislation. The use of fertilizers shall be controlled and not harmful to the environment. Supporting the natural processes of soil shall be preferred to fertilization.</p> <p>Note 1: natural mineral fertilizers are eg wood ash, peat ash, straw, hay and root ash; soil improvers are lime, dolomite powder, oil shale ash.</p> <p>Note 2: In case of plantations the requirement has to be met at least in buffer strips and set-aside areas of plantations.”</p> <p><i>Due to note 2 in clause 8.2.11 it is insufficiently ensured that fertiliser use in the commercial stands of plantations shall be applied in a controlled manner and with due consideration for the environment, where the fertilizer use shall not be an alternative to appropriate soil nutrient management.</i></p>
8.4.6 The standard requires that afforestation, reforestation and other tree planting activities that contribute to the improvement and restoration of ecological connectivity shall be promoted.	NO	<p>PEFC EST 1003:2022</p> <p>“8.4.7. The techniques contributing to maintaining, improving, recovering or restoring the ecological spatio-temporal coherence of the forest shall be preferred in forest management work.</p> <p>Note: In case of plantations the requirement has to be met at least in buffer strips and set-aside areas of plantations.</p> <p>Indicators: the organization has used necessary methods of work, as a result, there are structures and characteristics ensuring the ecological spatio-temporal coherence of the forest in the audited entity, eg retention trees of different species, groups of retention trees with the second layer and/or undergrowth; wood of different decomposition state (eg standing and lying dead trees, decomposed wood, stumps); buffer strips have been left; forest microstructures, forest of different composition and age, natural growth and diversity of undergrowth, as well as birds, animals, plants, mosses, lichens, fungi, etc of significant importance indicating the biological state and diversity of the forest have been preserved.</p> <p>Single retention trees or groups of retention trees have been left in the clear-cut area of 3 ha to ensure coherence; in case of areas over 3 ha groups of retention trees have been preferred.</p> <p>At least twice as many retention trees as required in the commercial forest have been left at the known site of category I and II species in the protected natural object. Trees and shrubs providing nectar and pollen are located mainly on the open edges of the felling sites (eg roads, division lines between compartments, ditches, shores of water bodies) or at least half of the canopy of these trees and bushes is exposed to light to enable them to develop blossoms.</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>Note or explanation to the buffer strip indicator: buffer strips are primarily left on the edge of the felling site adjacent to agricultural land, semi-natural grassland, bog or natural water-body. In case of suitable conditions, existing standing and lying dead trees shall be preserved and retention trees or groups of retention trees shall be left growing. The number of standing dead trees can be increased by stubbing, particularly in habitat types with a higher risk of wind-throw."</p> <p><i>The exemption provided for forest plantations in the note of the clause does not meet the PEFC benchmark requirement, as afforestation, reforestation and other tree planting activities that contribute to the improvement and restoration of ecological connectivity shall also be promoted within plantations.</i></p>



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 EST 1002:2022 Group Forest Management Certification – Requirements. The requirements are well developed, clearly structured and roughly follow the structure of the benchmark standard.

In Estonia, a significant part of the forest belongs to small forest owners, which makes the PEFC EST 1002 a relevant model to enable forest owners or holders of different forest management units to participate in certification. The requirements do not further define the types of groups that are allowed, which gives flexibilities to the forest owners. Chapter 4 further defines which indicators are to be implemented at group level with specific references to requirements of the SFM standard.

8.2 Nonconformities

There are three (3) 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 Group Certification Model.

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)																																
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;	NO	<p>PEFC EST 1002:2022</p> <p>“9.5.2.2.3. The size of the sample may be adapted taking into account one or more of the indicators from the Table 1.</p> <p>Table 1. Matrix for assessment of risk used for determination of sample categories for internal audit of group participants</p> <table><tr><th>Risk</th><th>Indicator for risk</th><th>Score</th></tr><tr><td rowspan="3">Forest area</td><td>Forest area < 500 ha</td><td>1 [Low]</td></tr><tr><td>Forest area 500 ha – 5 000 ha</td><td>3 [Medium]</td></tr><tr><td>Forest area > 5 000 ha</td><td>5 [High]</td></tr><tr><td rowspan="3">Forest management work</td><td>Organisation carried out forest management work more than 3 calendar years ago</td><td>1 [Low]</td></tr><tr><td>Organisation carried out forest management work within previous 2-3 calendar years</td><td>3 [Medium]</td></tr><tr><td>Organisation carried out forest management work within last calendar year</td><td>5 [High]</td></tr><tr><td rowspan="3">Results of internal audits and/or previous certification audits</td><td>Nonconformities and deficiencies have not been identified</td><td>1 [Low]</td></tr><tr><td>Up to 5 minor nonconformities have been identified</td><td>3 [Medium]</td></tr><tr><td>Over 5 minor nonconformities and/or a major nonconformity/some major nonconformities have been identified.</td><td>5 [High]</td></tr></table> <p>Table 2. Risk rankings</p> <table><tr><th>Risk ranking</th><th>Score (from Table 1.)</th></tr><tr><td>Low</td><td>Up to 5</td></tr><tr><td>Medium</td><td>From 6 to 9</td></tr><tr><td>High</td><td>From 10 to 15</td></tr></table> <p>Table 1 and 2 provide the indicators and their risk ranking to identify the risk score per risk category. However, the implications of the risk assessment on the sample size are not further defined, as the standard does not define the deviations of sample sizes in case of low or high risk for individual categories. It shall be noted such deviations shall be established in the standard.</p>	Risk	Indicator for risk	Score	Forest area	Forest area < 500 ha	1 [Low]	Forest area 500 ha – 5 000 ha	3 [Medium]	Forest area > 5 000 ha	5 [High]	Forest management work	Organisation carried out forest management work more than 3 calendar years ago	1 [Low]	Organisation carried out forest management work within previous 2-3 calendar years	3 [Medium]	Organisation carried out forest management work within last calendar year	5 [High]	Results of internal audits and/or previous certification audits	Nonconformities and deficiencies have not been identified	1 [Low]	Up to 5 minor nonconformities have been identified	3 [Medium]	Over 5 minor nonconformities and/or a major nonconformity/some major nonconformities have been identified.	5 [High]	Risk ranking	Score (from Table 1.)	Low	Up to 5	Medium	From 6 to 9	High	From 10 to 15
Risk	Indicator for risk	Score																																
Forest area	Forest area < 500 ha	1 [Low]																																
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Forest management work	Organisation carried out forest management work more than 3 calendar years ago	1 [Low]																																
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Results of internal audits and/or previous certification audits	Nonconformities and deficiencies have not been identified	1 [Low]																																
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Risk ranking	Score (from Table 1.)																																	
Low	Up to 5																																	
Medium	From 6 to 9																																	
High	From 10 to 15																																	



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)																		
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: b) results of internal audits or previous certification audits;	NO	<p>PEFC EST 1002:2022</p> <p>“9.5.2.2.3. The size of the sample may be adapted taking into account one or more of the indicators from the Table 1.</p> <p>Table 1. Matrix for assessment of risk used for determination of sample categories for internal audit of group participants</p> <table><tr><th>Risk</th><th>Indicator for risk</th><th>Score</th></tr><tr><td rowspan="3">Results of internal audits and/or previous certification audits</td><td>Nonconformities and deficiencies have not been identified</td><td>1 [Low]</td></tr><tr><td>Up to 5 minor nonconformities have been identified</td><td>3 [Medium]</td></tr><tr><td>Over 5 minor nonconformities and/or a major nonconformity/some major nonconformities have been identified.</td><td>5 [High]</td></tr></table> <p>Table 2. Risk rankings</p> <table><tr><th>Risk ranking</th><th>Score (from Table 1.)</th></tr><tr><td>Low</td><td>Up to 5</td></tr><tr><td>Medium</td><td>From 6 to 9</td></tr><tr><td>High</td><td>From 10 to 15</td></tr></table> <p><i>Table 1 and 2 provide the indicators and their risk ranking to identify the risk score per risk category, including results of internal audits or previous certification audits. However, it remains unclear how the results of the internal audits or previous certification audits will impact on the sample sizes, as table 1 and table 2 only result in a risk ranking, without defining the impact on sample size.</i></p>	Risk	Indicator for risk	Score	Results of internal audits and/or previous certification audits	Nonconformities and deficiencies have not been identified	1 [Low]	Up to 5 minor nonconformities have been identified	3 [Medium]	Over 5 minor nonconformities and/or a major nonconformity/some major nonconformities have been identified.	5 [High]	Risk ranking	Score (from Table 1.)	Low	Up to 5	Medium	From 6 to 9	High	From 10 to 15
Risk	Indicator for risk	Score																		
Results of internal audits and/or previous certification audits	Nonconformities and deficiencies have not been identified	1 [Low]																		
	Up to 5 minor nonconformities have been identified	3 [Medium]																		
	Over 5 minor nonconformities and/or a major nonconformity/some major nonconformities have been identified.	5 [High]																		
Risk ranking	Score (from Table 1.)																			
Low	Up to 5																			
Medium	From 6 to 9																			
High	From 10 to 15																			
9.3.3.2 Conditions which constitute risk for each indicator on low, medium and high level and the respective consequences for the sampling shall be defined.	NO	<p>PEFC EST 1002:2022</p> <p>“9.5.2.2.3. (...) Table 1. Matrix for assessment of risk used for determination of sample categories for internal audit of group participants</p> <table><tr><th>Risk</th><th>Indicator for risk</th><th>Score</th></tr><tr><td rowspan="3">Forest area</td><td>Forest area < 500 ha</td><td>1 [Low]</td></tr><tr><td>Forest area 500 ha – 5 000 ha</td><td>3 [Medium]</td></tr><tr><td>Forest area > 5 000 ha</td><td>5 [High]</td></tr></table>	Risk	Indicator for risk	Score	Forest area	Forest area < 500 ha	1 [Low]	Forest area 500 ha – 5 000 ha	3 [Medium]	Forest area > 5 000 ha	5 [High]								
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Forest area	Forest area < 500 ha	1 [Low]																		
	Forest area 500 ha – 5 000 ha	3 [Medium]																		
	Forest area > 5 000 ha	5 [High]																		



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)										
		Forest management work	Organisation carried out forest management work more than 3 calendar years ago	1 [Low]								
			Organisation carried out forest management work within previous 2-3 calendar years	3 [Medium]								
			Organisation carried out forest management work within last calendar year	5 [High]								
		Results of internal audits and/or previous certification audits	Nonconformities and deficiencies have not been identified	1 [Low]								
			Up to 5 minor nonconformities have been identified	3 [Medium]								
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		Table 2. Risk rankings										
		<table><tr><th>Risk ranking</th><th>Score (from Table 1.)</th></tr><tr><td>Low</td><td>Up to 5</td></tr><tr><td>Medium</td><td>From 6 to 9</td></tr><tr><td>High</td><td>From 10 to 15</td></tr></table>			Risk ranking	Score (from Table 1.)	Low	Up to 5	Medium	From 6 to 9	High	From 10 to 15
		Risk ranking	Score (from Table 1.)									
Low	Up to 5											
Medium	From 6 to 9											
High	From 10 to 15											
Table 1 and 2 provide the indicators and their risk ranking to identify the risk score per risk category. However, the standard does not define the respective consequences for the sampling per category.												



9. Chain of Custody Standard

The development report clarifies that “Chain of custody certification is carried out according to PEFC ST 2002:2020 Chain of Custody of Forest and Tree Based Products – Requirements.”

The Chain of Custody Standard of the EFCS 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 regulated in PEFC EST 1004:2022 Requirements for certification bodies operating PEFC forest management certification. The following steering documents are included as references for requirements for certification organisations:

- ISO/IEC 17011, Conformity assessment - General requirements for accreditation bodies accrediting conformity assessment bodies
- ISO/IEC 17021-1, Conformity assessment - Requirements for bodies providing audit and certification of management systems - Part 1: Requirements
- ISO/IEC 19011, Guidelines for auditing management systems ISO/IEC 19011:2018
- PEFC EST 1002:2022, Group forest management certification - Requirements
- PEFC EST 1003:2022, PEFC Estonia Sustainable forest management – Requirements

PEFC EGD 1006:2022 lists in section 2 normative references. In this section, PEFC ST 2003:2020 Requirements for Certification Bodies operating Certification against the PEFC International Chain of Custody Standard is listed. In addition, the Board and the General Meeting of PEFC Estonia voted for integrating International Chain of Custody and related standards (PEFC ST 2001, PEFC ST 2002 and PEFC ST 2003) into the Estonian certification scheme. Evidence for these decisions in minutes was found. This sufficiently ensures that the requirements of PEFC ST 2003-2020 are met by the EFCS.

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 EGD 1006:2022 EFCC Notification of Certification Bodies operating Chain of Custody and Forest Management Certification in Estonia against the requirements of the Estonian Forest Certification Scheme;

- **PEFC Logo Usage Licensing**

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

- **Complaints and Dispute Resolution Procedures**

These procedures are elaborated in PEFC EGD 1007:2022 Complaints and Appeals Settlement Procedure.

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>Statute of EFCC (Translated by Google Translate)</p> <p>“1.1. The official name of the association is the Estonian Forest Certification Council (hereinafter the association), in English Estonian Forest Certification Council.</p> <p>1.2. The seat of the company is the Republic of Estonia, Tallinn</p> <p>1.3 The purpose of the association is to contribute to the implementation of the principles of sustainable forestry in Estonia in forests by developing a forest certification model suitable for Estonian conditions in accordance with the Program for the Endorsement of Forest Certification (hereinafter PEFC) with the requirements of the scheme; to raise awareness of sustainable forestry with its activities, for which organize clarification and information work, trainings, conferences, prepare and publish prints etc.</p> <p>1.4. In order to achieve the goal, the Association may participate in international forest certification as a member of organizations, convene working groups of certification systems for development.</p> <p>1.6. The activity of the company is indefinite. The association is guided in its activities by the laws and the present</p>



PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>of the statute.</p> <p>1.7. The association is a voluntary association of legal entities operating in the public interest.</p> <p>5.1. The highest body of the association is the general meeting of members, which consists of all members of the association of members and is competent to take decisions concerning the activities of the entire association in matters that are not assigned to the competence of the board by the law or the articles of association.</p> <p>6.1. The company's activities are managed and represented by the board, which consists of at least three members more than twelve members.</p> <p>6.4. Competence of the board:</p> <p>c) manages the activities of the association and monitors the implementation of the decisions of the general meeting;"</p> <p>PEFC EST 1001:2020</p> <p>"6.4.1 EFCC shall establish a temporary working group based on nominations submitted to the standard setting working group.</p> <p>7.1 The general meeting of the EFCC shall formally approve the standard or normative document as soon as there is evidence of consensus among the steering group."</p>
(b) procedures for keeping documented information,	Procedures	YES	<p>PEFC EST 1001:2020</p> <p>"5.2.1 EFCC shall keep documented information relevant to the standard setting and review process. EFCC shall be responsible for the implementation, revision and keeping records on timely assessment of the standards. Giving evidence of the compliance with the requirements of this standard and EFCC's own procedures include:</p> <p>a) standard setting procedures;</p> <p>b) stakeholder identification mapping;</p> <p>c) contacted and/or invited stakeholders;</p> <p>d) stakeholders involved in standard setting activities including stakeholders participating in each working group meeting;</p> <p>e) feedback received and a synopsis of how feedback was addressed;</p> <p>f) all drafts and final drafts of the standard;</p> <p>g) outcomes from working group considerations;</p> <p>h) evidence of consensus on the final draft of the standard;</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			i) evidence relating to the review process and j) final approval of the final draft standard by EFCC."
(c) procedures for balanced representation of stakeholders,	Procedures	YES	<p>PEFC EST 1001:2020</p> <p>"6.2.1 EFCC shall identify stakeholders relevant to the objectives and scope of the standard setting activities by means of a stakeholder mapping exercise. It shall define which stakeholder groups are relevant to the subject matter and why. For each stakeholder group the EFCC shall identify the key stakeholders, their likely key issues and which means of communication would be best to reach them.</p> <p>6.2.2 EFCC shall identify stakeholder groups according to nine stakeholder groups as defined by Agenda 21 of the United Nations Conference on Environment and Development (UNCED) in Rio de Janeiro in 1992. At least the following groups shall be included in the standard stakeholder mapping:</p> <ul style="list-style-type: none"> • forest owners • business and industry • indigenous people • non-government organizations • scientific and technological community • workers and trade unions <p>6.2.3 EFCC shall identify disadvantaged stakeholders and key stakeholders and address any constraints to their participation in standard setting activities.</p> <p>6.4.1 b) EFCC shall involve all stakeholders identified as the key stakeholder groups by stakeholder group mapping (refer to p 6.2.2) to achieve balanced representation. Involvement of various stakeholder groups shall ensure that no single stakeholder group can dominate."</p>
(d) the standard-setting process,	Procedures	YES	<i>PEFC EST 1001:2020 describes the procedures for standard-setting, with main aspects of the process described in chapters 6 and 7.</i>
(e) the mechanism for reaching consensus, and	Procedures	YES	<p>PEFC EST 1001:2020</p> <p>"6.4.5 Achieving a consensus in the steering group is the prerequisite for the decision of the Board of EFCC to approve the final draft of the standard. In case there is no difference in opinion and no sustained opposition, the chairman of the meeting shall record the consensus as the decision of the meeting in the minutes of the meeting. In order to determine whether there is a consensus or any sustained opposition regarding the main issues, the steering group can use the following methods:</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>a) convene 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) etc.;</p> <p>b) organise a meeting using information technology solutions enabling real-time two-way communication or other similar electronic methods where the members can give a verbal yes/no vote;</p> <p>c) send an e-mail request to the members of the steering group for agreement or objection where the members provide a formal (written) response (vote) or d) use combinations of these methods to be confirmed by the working group at the beginning of the standard setting process."</p>
(f) review and revision of standard(s)/normative document(s).	Procedures	YES	<i>PEFC EST 1001:2020 describes the procedures for the review and revision of standard(s)/normative documents, with main aspects of the process described in chapters 8 and 9.</i>
5.1.2 The standardising body shall make its standard-setting procedures publicly available and shall review its standard-setting procedures regularly. The review shall consider feedback from stakeholders.	Procedures	YES	PEFC EST 1001:2020 "5.1.2 The standardising body (EFCC) shall make its standard setting procedures publicly available and shall review its standard setting procedures regularly. The review shall consider feedback from stakeholders."
	Process	YES	Notice on EFCS website, dated 30 January 2020 (translated with Google translate) "The working group of the standard prepares a draft of the standard, which will be made available to the public in the second half of 2020. The procedures for preparing the standard are public and can be found on the EMSN website. EMSN will forward the documents of the scheme translated into English to the international PEFC for conducting an independent international evaluation and for recognition by the PEFC Council in the first quarter of 2021. (...) We also ask for your opinion and feedback on the scope of the standard and the procedures for preparing the standard. The relevant documents are the following: Scope of the Standard and Compilation of the Standard_requirements. We ask for your feedback no later than February 20, 2020 at eve.rebane@pefc.ee ." <i>Standard-setting procedures were available on the EFCS website. EFCC received only one feedback from one NGO which agreed with the materials. EFCC noted that all feedback received was taken into account during the review.</i>
5.2.1 The standardising body shall keep documented information relevant to the standard-setting and review process. Evidence of compliance with the requirements of this standard and the standardising body's own procedures includes:			
(a) Standard-setting procedures,	Procedures	YES	PEFC EST 1001:2020 "5.2.1 The standardising body (EFCC) shall keep documented information relevant to the standard setting and review process. (...) Giving evidence of the compliance with the requirements of this standard and EFCC's own procedures

PEFC Conformity Assessment of the Estonian Forest Certification Scheme

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			include: a) standard setting procedures;"
	Process	YES	<i>Standard-setting procedures are found in the tender dossier.</i>
(b) Stakeholder identification mapping,	Procedures	YES	PEFC EST 1001:2020 "5.2.1 b) stakeholder identification mapping,"
	Process	YES	<i>Stakeholder identification mapping was found in document #Mapping of stakeholders involved in the renewal of the PEFC Estonian Forest Certification Scheme.</i>
(c) Contacted and/or invited stakeholders,	Procedures	YES	PEFC EST 1001:2020 "5.2.1 c) contacted and/or invited stakeholders,"
	Process	YES	<i>Emails from contacted and invited stakeholders were found in the Tender dossier.</i>
(d) Stakeholders involved in standard-setting activities including participants in each working group meeting,	Procedures	YES	PEFC EST 1001:2020 "5.2.1 d) stakeholders involved in standard setting activities including stakeholders participating in each working group meeting,"
	Process	YES	<i>Examples of attendance lists of working group meetings was found in a selection of minutes.</i>
(e) Feedback received and a synopsis of how feedback was addressed,	Procedures	YES	PEFC EST 1001:2020 "5.2.1 e) feedback received and a synopsis of how feedback was addressed,"
	Process	YES	<i>A document was found on the website of PEFC Estonia with feedback received and a synopsis of how feedback was addressed.</i>
(f) All drafts and final versions of the standard,	Procedures	YES	PEFC EST 1001:2020 "5.2.1 f) all drafts and final versions of the standard,"
	Process	YES	<i>All draft versions and final versions of the standard were found.</i>
(g) Outcomes from working group considerations,	Procedures	YES	PEFC EST 1001:2020 "5.2.1 g) outcomes from working group considerations;"
	Process	YES	<i>The agendas, minutes, and decisions from all working group considerations are found on the EFCC website (https://pefc.ee/avasta-pefc/pefc-skeemi-dokumendid/).</i>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
(h) Evidence of consensus on the final version of the standard(s),	Procedures	YES	PEFC EST 1001:2020 "5.2.1 h) evidence of consensus on the final draft of the standard;"
	Process	YES	<i>Proof of voting on final version of the PEFC Estonian Sustainable Forest Management Standard and consensus on the final version was found in minutes of the WG meeting and a tally of votes provided in documents A4, A5 and A34 in the tender dossier.</i>
(i) Evidence relating to the review process, and	Procedures	YES	PEFC EST 1001:2020 "5.2.1 i) evidence relating to the review process"
	Process	YES	<i>Evidence for the review process was found in meeting minutes, invitations for participation in the process, public announcements, a list of working draft versions of the standard and a summary of changes after the public comment.</i>
(j) Final approval by the standardising body.	Procedures	YES	PEFC EST 1001:2020 "5.2.1 j) final approval of the final draft standard by the standardising body (EFCC)."
	Process	YES	A24_Minutes of the General Assembly 4 May 2022 (Translated by Google Translate) "DECISION 11.: To approve the Estonian Forest Certification Scheme in the following composition: PEFC EST 1001:2020, Standard setting – Requirements PEFC EST 1002:2022, Group forest management certification – Requirements PEFC EST 1003:2022, Sustainable forest management – Requirements PEFC EST 1004:2022, Requirements for certification bodies operating PEFC forest management certification PEFC EGD 1005:2022, Issuance of PEFC trademarks usage licences by Estonian Forest Certification Council PEFC EGD 1006:2022, EFCC Notification of Certification Bodies operating Chain of Custody and Forest Management Certification in Estonia against the requirements of the Estonian Forest Certification Scheme PEFC EGD 1007:2022, Complaints and Appeals Settlement Procedure PEFC ST 2002:2020, Chain of Custody of Forest Based Products – Requirements PEFC ST 2001:2020, PEFC Trademark rules – Requirements PEFC ST 2003:2020, Requirements for Certification Bodies operating Certification against the PEFC International Chain of Custody Standard

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			7 in favour, 0 against, 0 abstentions."
5.2.2 Documented information shall be kept until completion of the next review or revision of the standard to which they refer. Otherwise the documented information must be kept for a minimum of five years after publication of the standard.	Procedures	YES	PEFC EST 1001:2020 "5.2.2 Documented information shall be kept until the completion of the next review or revision of the standard to which they refer. Otherwise the documented information must be kept for a minimum of five years after the publication of the standard."
	Process	YES	Explanation provided by EFCC: "Kept at the secretariat" <i>EFCC has explained that documented information is available at the secretariat. Also, numerous documents are found on the website of EFCC (https://pefc.ee/avasta-pefc/pefc-skeemi-dokumendid/).</i>
5.2.3 Documented information shall be available to interested parties upon request.	Procedures	YES	PEFC EST 1001:2020 "5.2.3 Documented information shall be available to interested parties upon request in the EFCC office or at the e-mail address info@pefc.ee."
	Process	YES	Explanation provided by EFCC: "Available at request at the secretariat" <i>Various documents are also available at the EFCC website (https://pefc.ee/avasta-pefc/pefc-skeemi-dokumendid/).</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 EST 1001:2020 "5.3.1 Disagreements concerning the substance of the standard and appeals relating to the working group and standard setting activities shall be discussed by the Commission that has a chairman and the parties of the dispute or appeal as members. The chairman has the right to appoint relevant specialists in the dispute. 5.3.2 The standardising body (EFCC) shall appoint an independent and impartial chairman to the Commission. The parties of the dispute or appeal shall appoint one member of the Commission case by case.

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>5.3.3 A written application for the resolution of the complaint or appeal shall be submitted to the CEO of the standardising body (EFCC) who shall acknowledge the receipt of the complaint or appeal and deliver the relevant material immediately to the chairman of the Commission. The latter shall initiate the procedure without delay. The contact details of the CEO of the standardising body (EFCC) are available on web page pefc.ee.</p> <p>5.3.4 Upon receipt of a complaint or appeal the standardising body (EFCC) shall:</p> <p>a) acknowledge the receipt of the complaint or appeal to the complainant;</p> <p>7.2.1 EFCC shall publish the formally approved standard/normative document and make these publicly available at no cost within 14 days of approval."</p>
	Process	N.A.	<p>Explanation provided by EFCC</p> <p>"We confirm that we received no complaints during the standard-setting process."</p>
(b) gather and verify all necessary information to validate the complaint or appeal, evaluate the subject matter of the complaint or appeal impartially and objectively, and make a decision regarding the complaint or appeal,	Procedures	YES	<p>PEFC EST 1001:2020</p> <p>"5.3.4 b) gather and verify all necessary information to validate the complaint or appeal, evaluate the subject matter of the complaint or appeal impartially and objectively, and make a decision regarding the complaint or appeal"</p>
	Process	N.A.	<p>Explanation provided by EFCC</p> <p>"We confirm that we received no complaints during the standard-setting process."</p>
(c) formally communicate the decision on the complaint or appeal to the complainant and describe the handling process.	Procedures	YES	<p>PEFC EST 1001:2020</p> <p>"5.3.4 c) formally communicate the decision on the complaint or appeal to the complainant and describe the process of the appeal."</p>
	Process	N.A.	<p>Explanation provided by EFCC</p> <p>"We confirm that we received no complaints during the standard-setting process."</p>
5.3.2 The standardising body shall establish at	Procedures	YES	<p>PEFC EST 1001:2020</p> <p>"5.3.5 Any questions related to making the inquiries and submitting complaints and appeals on the</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
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.			activities of standard setting can be delivered to the CEO of the standardising body (EFCC) whose contact details are available on the web page pefc.ee "
	Process	NO	<p>Decision of the Board 20-01-2020 (Translated by Google Translate)</p> <p>"PROCEDURE FOR COLLECTING OPINIONS ABOUT THE STANDARDS OF THE ESTONIAN FOREST CERTIFICATION COUNCIL AND HANDLING RECEIVED OPINIONS</p> <p>2. Opinions and suggestions about standards can be submitted to EMSN in writing at Toompuiestee 24, 10149 Tallinn or by e-mail at info@pefc.ee."</p> <p>Explanation provided by EFCC</p> <p>"(...) the general contact form and the CEO's contacts can be easily found on the homepage of the EMSN homepage under the main menu "Contact". EMSN's contacts have been available to all interest groups through letters, public announcements and letters asking for feedback, as well as through articles published in major portals.</p> <p>For the sake of clarity and transparency, an additional option for submitting requests, complaints, etc to the scheme updating block on the homepage regarding the standard-setting process will be added."</p> <p><i>A document containing the procedure for collecting opinions on the standards of the Estonian Forest Certification Council and handling received opinions (translated with Google translate) was found including a post address and an email address as contact points. Although this general contact point is available on the website of EFCC, no instruction is provided that this is the contact point that can be accessed for enquiries, complains and appeals. However, EFCC has noted that that this will be added.</i></p>
Standard-setting process			
6.1.1 For the creation of a new standard, the standardising body shall develop a proposal including:			
(a) the scope of the standard,	Procedures	YES	<p>PEFC EST 1001:2020</p> <p>"6.1.1 For the development of a new standard, the standardizing body shall specify a proposal including:</p> <p>a) the scope of the standard;"</p>
	Process	YES	<p>A9_Standard proposal_14.03.2022 (translated with Google Translate)</p> <p>"The PEFC Estonian National Forest Management Standard approved on 10.08.2015 is subject to updating. The basis is the international PEFC standard PEFC ST 1003:2018 "Sustainable Forest Management - Requirements", which was revised in 2018."</p>
	Procedures	YES	PEFC EST 1001:2020

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
(b) a justification of the need for the standard,			"6.1.1 b) the justification of the need for the standard;"
	Process	N.A.	<i>It should be noted that during the standard setting process requirements for the certification of Trees Outside Forest (TOF) were developed. For this purpose a proposal was developed, which was found in the tender dossier. However, the TOF requirements are not covered by the current assessment, because they are currently no longer part of the Estonian scheme.</i>
(c) a clear description of the intended outcomes	Procedures	YES	PEFC EST 1001:2020 "6.1.1 c) a clear description of the intended outcomes;"
	Process	N.A.	<i>It should be noted that during the standard setting process requirements for the certification of Trees Outside Forest (TOF) were developed. For this purpose a proposal was developed, which was found in the tender dossier. However, the TOF requirements are not covered by the current assessment, because they are currently no longer part of the Estonian scheme.</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 EST 1001:2020 "6.1.1 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"
	Process	N.A.	<i>It should be noted that during the standard setting process requirements for the certification of Trees Outside Forest (TOF) were developed. For this purpose a proposal was developed, which was found in the tender dossier. However, the TOF requirements are not covered by the current assessment, because they are currently no longer part of the Estonian scheme.</i>
(e) a description of the stages of standard	Procedures	YES	PEFC EST 1001:2020 "6.1.1 e) a description of the stages of the 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. ¹⁵	Process	YES	<p>A9_Standard proposal_14.03.2022 (translated with Google Translate)</p> <p>“The official announcement about the initiation of changes to the PEFC Estonian National Forest Management Standard will be published on 30.01.2020, in which stakeholders are asked to appoint a representative to the working group of the standard and to give feedback on the standard PEFC EST 1001:2020 "Development of the standard – requirements”.</p> <ul style="list-style-type: none"> - In order to change the Estonian National Forest Management Standard, EMSN forms a working group. - The working group will start work at the beginning of March 2020, and the work of the working group is planned to be completed by May 2022. - The standard version disclosure period of 60 days is planned for the 3rd quarter of 2020. - The publication period of version II of the standard regarding the new addition to the standard, i.e. the requirements for certification of trees growing in non-forest land, 30 days is planned for the I to II quarters of 2022. - All documents of the Estonian Forest Certification Scheme, including the forest management standard, will be submitted to the international evaluator in the second quarter of 2022. - Information days to introduce changes to the Estonian Forest Certification Scheme will be held during 2022. - The Estonian Forest Certification Scheme has been updated and submitted to the international PEFC no later than 14.05.2022.”
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	<p>PEFC EST 1001:2020</p> <p>“6.1.2 For the revision of the standard the proposal shall cover at least (a) and (e) of clause 6.1.1.”</p>
	Process	YES	<p><i>The project proposal (document A9) for the revision of the PEFC Estonian National Forest Management Standard contains at least (a) and (e) of clause 6.1.1 as described above.</i></p>
6.2.1 The standardising body shall identify stakeholders relevant to the objectives and scope of the standard-	Procedures	YES	<p>PEFC EST 1001:2020</p> <p>“6.2.1 The standardising body (EFCC) shall identify stakeholders relevant to the objectives and scope of the standard setting activities by means of a stakeholder mapping exercise. It shall define which stakeholder groups are relevant to the subject matter and why. For each stakeholder group the EFCC shall identify the key stakeholders, their likely key issues and which means of communication would be best to reach them.”</p>

¹⁵ 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)									
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.	Process	YES	<p>A2_Stakeholder mapping_21.01.20 Board Meeting</p> <p>“</p> <table><tr><th>The main stakeholders participating in the development of the Sustainable Forest Management Standard</th><th>The expected key issues for the stakeholder</th><th>The best communication tools for stakeholder engagement</th></tr><tr><td>Forest owners</td><td><p>Forest owners are the target group whose activities are most directly affected by the requirements of the sustainable forest management standard. It is important for forest owners to ensure</p><ul style="list-style-type: none">• long-term, sustainable and diverse management of forest resources• (long-term) profitability of forest management• balance between economic, environmental and social objectives<p>There are about 110,000 private forest owners in Estonia of which about 200 owners have their forests certified according to the PEFC scheme (about 270 thousand ha). The entire state forest has been certified (1.03 million ha, including the forest of Luua Forestry School).</p></td><td><p>EFCC mapped stakeholders and asked for their feedback on the requirements for the revision of the standard.</p><p>A letter and an e-mail were sent to stakeholders inviting them to participate in the work of the sustainable forest standard working group.</p><p>In case the stakeholders did not provide feedback on the invitation by the due date, the contact details were checked and the invitation was sent again with the materials attached.</p></td></tr><tr><td>Business and industry</td><td>Transparency in the chain of custody, access to as much sustainably grown material as possible and a stable business environment are important for</td><td></td></tr></table> <p>”</p>	The main stakeholders participating in the development of the Sustainable Forest Management Standard	The expected key issues for the stakeholder	The best communication tools for stakeholder engagement	Forest owners	<p>Forest owners are the target group whose activities are most directly affected by the requirements of the sustainable forest management standard. It is important for forest owners to ensure</p> <ul style="list-style-type: none">• long-term, sustainable and diverse management of forest resources• (long-term) profitability of forest management• balance between economic, environmental and social objectives <p>There are about 110,000 private forest owners in Estonia of which about 200 owners have their forests certified according to the PEFC scheme (about 270 thousand ha). The entire state forest has been certified (1.03 million ha, including the forest of Luua Forestry School).</p>	<p>EFCC mapped stakeholders and asked for their feedback on the requirements for the revision of the standard.</p> <p>A letter and an e-mail were sent to stakeholders inviting them to participate in the work of the sustainable forest standard working group.</p> <p>In case the stakeholders did not provide feedback on the invitation by the due date, the contact details were checked and the invitation was sent again with the materials attached.</p>	Business and industry	Transparency in the chain of custody, access to as much sustainably grown material as possible and a stable business environment are important for	
The main stakeholders participating in the development of the Sustainable Forest Management Standard	The expected key issues for the stakeholder	The best communication tools for stakeholder engagement										
Forest owners	<p>Forest owners are the target group whose activities are most directly affected by the requirements of the sustainable forest management standard. It is important for forest owners to ensure</p> <ul style="list-style-type: none">• long-term, sustainable and diverse management of forest resources• (long-term) profitability of forest management• balance between economic, environmental and social objectives <p>There are about 110,000 private forest owners in Estonia of which about 200 owners have their forests certified according to the PEFC scheme (about 270 thousand ha). The entire state forest has been certified (1.03 million ha, including the forest of Luua Forestry School).</p>	<p>EFCC mapped stakeholders and asked for their feedback on the requirements for the revision of the standard.</p> <p>A letter and an e-mail were sent to stakeholders inviting them to participate in the work of the sustainable forest standard working group.</p> <p>In case the stakeholders did not provide feedback on the invitation by the due date, the contact details were checked and the invitation was sent again with the materials attached.</p>										
Business and industry	Transparency in the chain of custody, access to as much sustainably grown material as possible and a stable business environment are important for											



				wood and wood-based businesses and industries.	
			Non-governmental organizations (NGOs)	<p>In the course of stakeholder mapping, EFCC identified 48 NGOs, companies and other organizations that might be interested in sustainable forest management and diverse use of the forest.</p> <p>Topics relevant to NGOs vary widely, including the use of forests and the use of wood and wood-based products, the personal right of use and recreation, as well as the use of ecosystem services based on, for example, contracts with forest owners.</p> <p>The standard working group may add members in the course of its work and consult with experts in the revision process of the Standard.</p>	
			Scientific and Technological Community	<p>Scientific and technological community provide information on forests and their dynamics, the various aspects of sustainability and the possibilities for using technology in the planning, implementation and monitoring of the activities and in the development of forest-related products and services.</p> <p>It is important for the Scientific and Technological Communities to integrate the potential of science-based knowledge and technology as a part of the content debate on sustainable forestry in the standards.</p>	
			Workers and Trade Unions	<p>Forests provide employment and livelihoods for those working in the forest as well as for those working with materials and services from the forest.</p> <p>Employment and job opportunities, skills development and safe working conditions, as well as proper working conditions are the key issues for workers and their stakeholders.</p>	
			Local municipalities	The local government is the organiser of the development (general) plans; also, it	



PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)					
			<table border="1"><tr><td></td><td><p>initiates and develops plans on the local level (detailed, thematic and special planning).</p><p>Spatial planning creates preconditions for the development of a democratic, long-term, balanced spatial development, land use, high-quality living and built environment that takes into account the needs and interests of the members of the society, promoting environmentally friendly and economically, culturally and socially sustainable development. The task of the local government is to designate the green network in the plans and to specify the conditions and restrictions to ensure the operation of the green network.</p><p>For the local government, the relation to the certification is important in the planning process (it also sets the conditions for land use) and in ensuring sustainability at the local level.</p></td><td></td></tr></table> <p>Section 2</p> <table border="1"><tr><td>b) Key stakeholders</td><td>EFCC considers it important that all key stakeholders identified in the stakeholder mapping participate in the revision of the standard.</td></tr></table> <p>„</p> <p><i>A stakeholder map was found that identifies all stakeholder groups, their likely key issues, and which means of communication would be best to reach them. An overview is also found of all organisations identified per stakeholder group. It shall be noted that EFCC considers all stakeholders as a key stakeholder. All respondents from the stakeholder survey confirmed that all stakeholders that are relevant to the standard-setting process have been proactively identified and invited.</i></p>		<p>initiates and develops plans on the local level (detailed, thematic and special planning).</p> <p>Spatial planning creates preconditions for the development of a democratic, long-term, balanced spatial development, land use, high-quality living and built environment that takes into account the needs and interests of the members of the society, promoting environmentally friendly and economically, culturally and socially sustainable development. The task of the local government is to designate the green network in the plans and to specify the conditions and restrictions to ensure the operation of the green network.</p> <p>For the local government, the relation to the certification is important in the planning process (it also sets the conditions for land use) and in ensuring sustainability at the local level.</p>		b) Key stakeholders	EFCC considers it important that all key stakeholders identified in the stakeholder mapping participate in the revision of the standard.
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6.2.2 Identification of stakeholder groups shall be based on nine major stakeholder groups as defined by Agenda 21 of the United Nations	Procedures	YES	<p>PEFC EST 1001:2020</p> <p>“6.2.2 The standardising body (EFCC) shall identify stakeholder groups according to nine stakeholder groups as defined by Agenda 21 of the United Nations Conference on Environment and Development (UNCED) in Rio de Janeiro in 1992. At least the following groups shall be included in the standard stakeholder mapping:</p> <ul style="list-style-type: none">• forest owners• business and industry• indigenous people					

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<p><i>Conference on Environment and Development</i> (UNCED) in Rio de Janeiro in 1992. At least the following groups shall be included in the stakeholder mapping:</p> <ul style="list-style-type: none"> • forest owners, • business and industry, • indigenous people, • non-government organisations, • scientific and technological community, • workers and trade unions. <p>Other groups shall be added if relevant to the scope of standard-setting activities.¹⁶</p>			<ul style="list-style-type: none"> • non-government organizations • scientific and technological community • workers and trade unions <p>Other groups shall be added if relevant to the scope of the standard setting activities.”</p>
	Process	YES	<p><i>All required groups are present in the stakeholder identification mapping (see evidence A2 under requirement 6.2.1 above). EFCC also included the local government as a (key) stakeholder group, because of their role in developing and enforcing detail plannings, including green networks. It shall be noted that there are no indigenous peoples in Estonia.</i></p>
6.2.3 The standardising body shall identify disadvantaged	Procedures	YES	<p>PEFC EST 1001:2020</p> <p>“6.2.3 The standardising body (EFCC) shall identify disadvantaged stakeholders and key stakeholders and address any constraints to their participation in standard setting activities.</p> <p>Note: A stakeholder can be both a disadvantaged and a key stakeholder at the same time.”</p>

¹⁶ 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)						
stakeholders and key stakeholders and address any constraints to their participation in standard-setting activities. ¹⁷	Process	YES	<p>A1_21.01.2020_Stakeholder Mapping_EFCC GA (Translated by Google Translate)</p> <p>“</p> <table><tr><th><i>Stakeholders (a and b)</i></th><th><i>Constraints to the participation of a stakeholder in standard setting activities and addressing these constraints</i></th></tr><tr><td><i>a) Disadvantaged stakeholders</i></td><td><i>Disadvantaged participants may be stakeholders operating far from Tallinn/centres of attraction who do not have good transport connection to centres of attraction or have to bear high transportation costs to Tallinn.</i> <i>If necessary, the following measures shall be taken to address the constraints to participation:</i> <i>a) allow online participation in the meeting (eg Skype);</i> <i>b) provide the stakeholder representative with written materials of the working group meeting;</i> <i>c) organize some of the meetings outside Tallinn in other Estonian centres of attraction;</i> <i>d) hold one-to-one meetings with the scheme coordinator and/or working group leader.</i> <i>e) negotiate for the reimbursement of the transport costs with EFCC if it is necessary to ensure the personal presence of a stakeholder representative at the meeting.</i></td></tr><tr><td><i>b) Key Stakeholders</i></td><td><i>EFCC considers it important that all key stakeholders identified in the stakeholder mapping participate in the revision of the standard.</i> <i>Stakeholders have an opportunity to influence the results of the standard setting by participating in the work of the standard working group and providing input, comments and amendments to the enquiry draft during the public consultation.</i></td></tr></table> <p>”</p> <p><i>It shall be noted that EFCC considers all stakeholders as key stakeholders.</i></p>	<i>Stakeholders (a and b)</i>	<i>Constraints to the participation of a stakeholder in standard setting activities and addressing these constraints</i>	<i>a) Disadvantaged stakeholders</i>	<i>Disadvantaged participants may be stakeholders operating far from Tallinn/centres of attraction who do not have good transport connection to centres of attraction or have to bear high transportation costs to Tallinn.</i> <i>If necessary, the following measures shall be taken to address the constraints to participation:</i> <i>a) allow online participation in the meeting (eg Skype);</i> <i>b) provide the stakeholder representative with written materials of the working group meeting;</i> <i>c) organize some of the meetings outside Tallinn in other Estonian centres of attraction;</i> <i>d) hold one-to-one meetings with the scheme coordinator and/or working group leader.</i> <i>e) negotiate for the reimbursement of the transport costs with EFCC if it is necessary to ensure the personal presence of a stakeholder representative at the meeting.</i>	<i>b) Key Stakeholders</i>	<i>EFCC considers it important that all key stakeholders identified in the stakeholder mapping participate in the revision of the standard.</i> <i>Stakeholders have an opportunity to influence the results of the standard setting by participating in the work of the standard working group and providing input, comments and amendments to the enquiry draft during the public consultation.</i>
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6.3.1 The standardising body shall make a public announcement of the start of the	Procedures	YES	<p>PEFC EST 1001:2020</p> <p>“6.3.1 The standardising body (EFCC) shall make a public announcement of the start of the standard setting process and shall invite stakeholders to participate in the process. EFCC shall make the announcement through suitable media and send an invitation to all stakeholders identified by the mapping exercise at least four weeks before the first meeting of the working group.</p>						

¹⁷ NOTE A stakeholder can be both a disadvantaged and a key stakeholder at the same time.

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
standard-setting process and include an invitation to stakeholders to participate in the process. The announcement shall be made in a timely manner ¹⁸ through suitable media ¹⁹ , as appropriate, to give stakeholders an opportunity for meaningful contributions.			Note 2: Through suitable media means at least through the EFCC'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 organizations, social media, digital media, etc."
	Process	YES	Public Announcement 30 January 2020 found on the website of EFCC (translated with Google Translate) "The Estonian Forest Certification Council of the NGO announces that we have started updating the PEFC Estonian Forest Certification Scheme, and therefore we invite you to participate in the process of updating the PEFC forest certification criteria. (...) EMSNI invites all interested parties to participate in the process of updating the criteria. All interest groups interested in sustainable forest management can participate in the standard's working group." <i>Standard setting activities started on 10 March 2020, the public announcement was therefore published in a timely manner (more than four weeks before the first meeting of the WG) on the EFCC website: https://pefc.ee/183-teade-pefc-metsasertifitseerimise-nouete-ulevaatamisega-alustamise-kohta-ning-kutse-osalema-toeoeuehma-toeoes/. An invitation letter sent by email to stakeholders was also found.</i>
6.3.1 The announcement and invitation shall include:			
(a) overview of the standard-setting process,	Procedures	YES	PEFC EST 1001:2020 "6.3.1 The public announcement and invitation shall include: a) an overview of the standard setting process;"
	Process	YES	Public Announcement 30 January 2020 found on the website of EFCC (translated with Google Translate) "EMSNI forms a working group to update the PEFC National Forest Management Standard. The task of the working group of the standard is to review the content of the PEFC Estonian forest management criteria and ensure their compliance with the international PEFC sustainability criteria. The work covers the entire scope of the PEFC international forest management standard PEFC ST 1003:2018. (...) The working group will start work at the beginning of March 2020, and the work is planned to be completed by the end of October. (...) The working group of the standard prepares a draft of the standard, which will be made available

¹⁸ NOTE 1 *In a timely manner* means (at the latest) four weeks before the first standard-setting activity is scheduled to occur.

¹⁹ 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)
			to the public in the second half of 2020. The procedures for preparing the standard are public and can be found on the EMSN website. EMSN will forward the documents of the scheme translated into English to the international PEFC for conducting an independent international evaluation and for recognition by the PEFC Council in the first quarter of 2021.” <i>In the Public Announcement 30 January 2020 on the website of EFCC a link was found to a document on the scope of the standard, which also including an overview of the different stages standard-setting process. The invitation letter to stakeholders was sent on 31 January 2020 and contains very similar information.</i>
(b) access to the proposal for the standard (refer to 6.1),	Procedures	YES	PEFC EST 1001:2020 “6.3.1 b) access to the proposal for the standard (refer to 6.1);”
	Process	YES	<i>In the Public Announcement 30 January 2020 on the website of EFCC a description and a link was found to the drafting proposal for the standard.</i>
(c) information about opportunities for stakeholders to participate in the process,	Procedures	YES	PEFC EST 1001:2020 “6.3.1 c) information about the opportunities for stakeholders to participate in the process;”
	Process	YES	Public Announcement 30 January 2020 found on the website of EFCC (translated with Google Translate) “The Estonian Forest Certification Council of the NGO announces that we have started updating the PEFC Estonian Forest Certification Scheme, and therefore we invite you to participate in the process of updating the PEFC forest certification criteria. (...) EFCC invites all interested parties to participate in the process of updating the criteria. All interest groups interested in sustainable forest management can participate in the standard's working group. We ask you to nominate a representative of your organization or company and his substitute as a member of the working group and forward the contact details of the representative to EMSN by February 20, 2020 at the latest.” Invitation to stakeholders 31 January 2020 “At this point, we expect the representative(s) of your organization or company to participate in the work of the PEFC forest management standard working group, and we ask you to send the contact details of the representative(s) and alternate member(s) to EMSN (eve.rebane@pefc.ee) no later than February 20, 2020. If you are not able to participate in the work of the working group, you can express your opinion and make proposals to the draft standard, e.g. during the period of its publication (August-September).”
(d) requests to stakeholders to	Procedures	YES	PEFC EST 1001:2020 “6.3.1 d) a request to stakeholders to nominate their representative(s) to the working group (refer to 6.4).

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
nominate their representative(s) or themselves to the working group (refer to 6.4). The request to disadvantaged stakeholders and key stakeholders shall be made in a manner that ensures that the information reaches intended recipients and in a format that is easy to understand,			The request to disadvantaged stakeholders and key stakeholders shall be made in a manner that ensures that the information reaches intended recipients in a format that is easy to understand;"
	Process	YES	Public Announcement 30 January 2020 found on the website of EFCC (translated with Google Translate) "We ask you to nominate a representative of your organization or company and his substitute as a member of the working group and forward the contact details of the representative to EFCC by February 20, 2020 at the latest." <i>An e-mail invitation including a request to nominate themselves or a representative to participate was also sent to all identified stakeholders found.</i>
(e) explicit invitation and clear instruction on how to submit feedback on the scope and standard-setting process, and	Procedures	YES	PEFC EST 1001:2020 "6.3.1 e) explicit invitation and clear instruction on how to submit feedback on the scope and process of standard setting"
	Process	NO	Public Announcement 30 January 2020 found on the website of EFCC (translated with Google Translate) "We also ask for your opinion and feedback on the scope of the standard and the procedures for preparing the standard. The relevant documents are the following: <u>Scope of the Standard and Compilation of the Standard requirements</u> . We ask for your feedback no later than February 20, 2020 at eve.rebane@pefc.ee ." Explanation provided by EFCC "It is a specifics of the language. We have asked for feedback on the standard-setting procedures. Since the procedure is a description of the process described in PEFC EST 1001, and since the standard-setting procedure is based on this standard, we have asked for feedback on the standard-setting process on the basis of the established requirements (because the standard-setting process is described in the standard "Standard setting - Requirements")." <i>Although the public announcement contains a request to stakeholders to comment on the scope of the standard, no explicit instruction was made that stakeholders could submit feedback on the standard setting process.</i>
	Procedures	YES	PEFC EST 1001:2020

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
(f) access to the standard-setting procedures.			"6.3.1 f) access to the standard setting requirements (PEFC EST 1001:2020)."
	Process	YES	<i>A link to the standard setting procedures PEFC EST 1001:2002 was found in the public announcement and invitation to stakeholders.</i>
6.3.2 The standardising body shall review the standard-setting process based on feedback received in response to the public announcement.	Procedures	YES	PEFC EST 1001:2020 "6.3.2 The standardising body (EFCC) shall review the standard setting process based on the feedback received in response to the public announcement."
	Process	N.A.	<i>EFCC explained that no feedback was received on the standard setting process in response to the public announcement.</i>
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	Procedures	YES	PEFC EST 1001:2020 "6.4.1 The standardising body (EFCC) shall establish a temporary working group based on nominations submitted to the standard setting working group. The objective of the EFCC is to provide all stakeholders interested in sustainable forest management with equal opportunities to participate in the standard setting working group. b) EFCC shall involve all stakeholders identified as the key stakeholder groups by stakeholder group mapping (refer to p 6.2.2) to achieve balanced representation. Involvement of various stakeholder groups shall ensure that no single stakeholder group can dominate. 4. Balanced representation – no single stakeholder group shall dominate or be dominated in the process. While each party is free to decide on its participation, EFCC makes an effort to ensure that all relevant stakeholder groups are represented and consider an appropriate gender balance"
	Process	YES	Stakeholder list Provided by EFCC

PEFC Conformity Assessment of the Estonian Forest Certification Scheme

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)																																		
the organisation, an individual's competence, an individual's relevant experience and resources available for standard-setting.			<table><tr><th>Stakeholder group</th><th>Organisation</th><th>SFM ST Working Group members</th></tr><tr><td rowspan="9">Forest owners</td><td>NGO Eesti Erametsaliit (Member of the EFCC, owner of the PEFC FM certificate)</td><td>Kertu Kekk, later Mari Tuvikene Kristel Pern</td></tr><tr><td>RMK (owner of the PEFC FM certificate)</td><td>Rainer Laigu</td></tr><tr><td>Luua Metsanduskool (Member of the EFCC, owner of the PEFC FM certificate)</td><td>Veiko Belials, who is also on the board of the EFCC and thus involved in the matter</td></tr><tr><td>TÜ Keskühistu Eramets (owner of the PEFC FM certificate)</td><td>Priit Jõeäär, later Priit Põllumäe</td></tr><tr><td>Järvsella Metskond SA</td><td>Tanel Piir</td></tr><tr><td>Timberwise OÜ*</td><td>Jane K Kronberg</td></tr><tr><td>Ühinenud Metsaomanikud NGO*</td><td>Kadri-Aiia Vilk Substitute member Pille-Riin Ressar, later Anett Reient</td></tr><tr><td>Tomator OÜ*</td><td>Martin Tishler</td></tr><tr><td>HD Forest OÜ*</td><td>Kristi Nigul</td></tr><tr><td rowspan="3">Business and industry</td><td>NGO Eesti Metsa- ja Puidutööstuse Liit (Member of the EFCC)</td><td>Henrik Välja, substitute member Pille Meier Henrik Välja is also on the board of the EFCC and thus involved in the matter</td></tr><tr><td>NGO Eesti Taastuvenergia Koda</td><td>Mihkel Annus since 09.2021</td></tr><tr><td>Graanul Invest AS*</td><td>Marti Piirimäe, substitute member Mihkel Jugaste</td></tr><tr><td rowspan="2">Scientific and technological community</td><td>Tartu Ülikool</td><td>Jaan Liira</td></tr><tr><td>Eesti Maaülikool (Member of the EFCC)</td><td>Kristina Aun, Regino Kask is also on the board of the EFCC and thus involved in the matter</td></tr></table>	Stakeholder group	Organisation	SFM ST Working Group members	Forest owners	NGO Eesti Erametsaliit (Member of the EFCC, owner of the PEFC FM certificate)	Kertu Kekk , later Mari Tuvikene Kristel Pern	RMK (owner of the PEFC FM certificate)	Rainer Laigu	Luua Metsanduskool (Member of the EFCC, owner of the PEFC FM certificate)	Veiko Belials, who is also on the board of the EFCC and thus involved in the matter	TÜ Keskühistu Eramets (owner of the PEFC FM certificate)	Priit Jõeäär , later Priit Põllumäe	Järvsella Metskond SA	Tanel Piir	Timberwise OÜ*	Jane K Kronberg	Ühinenud Metsaomanikud NGO*	Kadri-Aiia Vilk Substitute member Pille-Riin Ressar , later Anett Reient	Tomator OÜ*	Martin Tishler	HD Forest OÜ*	Kristi Nigul	Business and industry	NGO Eesti Metsa- ja Puidutööstuse Liit (Member of the EFCC)	Henrik Välja , substitute member Pille Meier Henrik Välja is also on the board of the EFCC and thus involved in the matter	NGO Eesti Taastuvenergia Koda	Mihkel Annus since 09.2021	Graanul Invest AS*	Marti Piirimäe , substitute member Mihkel Jugaste	Scientific and technological community	Tartu Ülikool	Jaan Liira	Eesti Maaülikool (Member of the EFCC)	Kristina Aun , Regino Kask is also on the board of the EFCC and thus involved in the matter
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			<p>A11_Minutes of the Board meeting 9 March 2020</p> <p>“2. To ensure independence and impartiality, the following members of the working group do not take part in the decision-making of the working group:</p> <p>BM Certification Estonia OÜ Ülo Roop</p> <p>NCS Estonia OÜ Renal Lastik Björn Sild</p> <p>SA Estonian Accreditation Center Eire Endrekson</p> <p>Metrosert AS Andres Martma”</p> <p>Explanation provided by EFCC</p> <p>“The board discussed nominations and letters from ENGO-s umbrella organization (Eesti Keskkonnaühenduste Koda, who is a representative of 12 ENGO-s) and Eesti Keskkonnahariduse Ühing. They both sent their arguments about why they won't participate in the process.</p>																																		

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>The board considered all the arguments (<i>balanced representation, gender balance, relevance of the organisation, individual's competence, experience and resources</i>) in the requirement and found that all nominated members met the requirements and accepted their nomination entirely. A particular clause was set for certification bodies and accreditation body. To ensure independence and impartiality, the following members of the working group do not take part in the decision-making of the working group - BM Certification Estonia OÜ, NCS Estonia OÜ, Metrosert AS, SA Eesti Akrediteerimiskeskus.”</p> <p><i>The establishment of a temporary working group was found (A11) to updating the PEFC Estonian National Forest Management Standard. The working group is made up of a balanced mix of stakeholder groups. This is confirmed by respondents to the stakeholder survey.</i></p>
6.4.2 The working group shall:			
(a) have balanced representation and decision-making by stakeholder categories, relevant to the subject matter and geographical scope of the standard, where no single concerned stakeholder group can dominate, nor be dominated in the process, and	Procedures	YES	<p>PEFC EST 1001:2020</p> <p>“6.4.1 a) All stakeholders identified by mapping and having notified of the participation can participate in the working group;</p> <p>b) EFCC shall involve all stakeholders identified as the key stakeholder groups by stakeholder group mapping (refer to p 6.2.2) to achieve balanced representation. Involvement of various stakeholder groups shall ensure that no single stakeholder group can dominate.</p> <p>6.4.2 b) every stakeholder group has equal opportunities to influence the decision-making process and possible voting situations. No stakeholder group can make up a majority and no key stakeholder group can be excluded from decision-making;</p> <p>c) stakeholder groups shall participate in the discussions with expertise relevant to the subject matter of the standard and/or for example, by submitting written presentations or other material to other working groups;</p> <p>6.4.3 The standardising body (EFCC) shall aim at involving the highest possible number of all identified stakeholder groups (refer to 6.2) and all key stakeholder groups in the working groups of the standard;”</p>
	Process	YES	<p>Stakeholder list Provided by EFCC</p> <p>“</p>

PEFC Conformity Assessment of the Estonian Forest Certification Scheme

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)																																				
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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	Procedures	YES	<p>PEFC EST 1001:2020</p> <p>“6.4.2 b) every stakeholder group has equal opportunities to influence the decision-making process and possible voting situations. No stakeholder group can make up a majority and no key stakeholder group can be excluded from decision-making;</p> <p>c) stakeholder groups shall participate in the discussions with expertise relevant to the subject matter of the standard and/or for example, by submitting written presentations or other material to other working groups;</p> <p>d) the affected stakeholders shall be represented in an appropriate proportion among the members of</p>																																		



PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
implementation of the standard. The affected stakeholders shall be represented in an appropriate proportion among participants.			the working group of the standard. 6.4.3 The standardising body (EFCC) shall aim at involving the highest possible number of all identified stakeholder groups (refer to 6.2) and all key stakeholder groups in the working groups of the standard;”
	Process	YES	<i>The working group is made up of stakeholders with expertise relevant to the standard (members from the scientific and technical community as well as NGOs), affected stakeholders and stakeholders that can influence implementation of the standard. There is balanced representation of all stakeholder groups in the WG, including affected stakeholders.</i>
6.4.3 In order to achieve balanced representation, the standardising body shall strive to have all identified stakeholder groups (refer to 6.2) represented. ²⁰ 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 EST 1001:2020 “6.4.2 b) (...) No stakeholder group can make up a majority and no key stakeholder group can be excluded from decision-making; 6.4.3 The standardising body (EFCC) shall aim at involving the highest possible number of all identified stakeholder groups (refer to 6.2) and all key stakeholder groups in the working groups of the standard; as well as ensuring the broadest representation. EFCC shall proactively seek to engage stakeholders by using outreach such as (but not limited to) personal emails, phone calls, meeting invitations etc.”
	Process	YES	Invited stakeholders list “

²⁰ NOTE When a stakeholder group is not represented and key stakeholders cannot be encouraged to participate, the standardising body may consider alternative options.

Stakeholder group	Organization
Forest owners	Eesti Erametsaliit RMK Luua Metsanduskool KÜ Eramets Eesti Evangeelne Luterlik Kirik Järvselja Metskond SA
Forest and wood industry <i>(Business and Industry)</i>	Eesti Metsa- ja Puidutööstuse Liit Eesti Puitmajaliit TÜ Eesti Puidumüügikeskus Eesti Taastuvenergia Koda Eesti Mööblitootjate Liit Eesti Trüki- ja Pakenditööstuse Liit
Scientific and Technological Community	Tartu Ülikool Tallinna Tehnikaülikool Eesti Maaülikool
Workers and Trade Unions	Eesti Metsateenijate Ühing Eesti Metsatöötajate Ametiühing
NGOs	Eesti Looduskaitse Selts Eesti Metsaselts Eesti Looduseuurijate Selts (Metsandusseksioon) Eesti Orienteerumisliit Eesti Põllumajandus-Kaubanduskoda (Keskühistu Eramets) MTÜ Eesti Keskkonnahariduse Ühing Arengukoostöö Ümarlaud Organic-Estonia MTÜ Eesti Jahimeeste Selts Eesti Keskkonnaühenduste Koda, sh: Eesti Loodusturismi Ühing
Local authorities	Eesti Linnade ja Valdade Liit Saarde Vald MTÜ Väikesaarte Liit
Other	NCS Estonia OÜ Metrosert AS NepCon BM Certification Estonia OÜ SA Eesti Akrediteerimiskeskus Erametsakeskus Eesti Metsaüliõpilaste Selts



PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p><i>The Stakeholder list provides an overview of all WG members and to which stakeholder group they belong. All identified stakeholder groups (refer to 6.2) are represented. The target to involve all key stakeholder groups in the working groups of the standards is met. EFCC has explained and provided evidence that the participation of stakeholders was actively sought through the public announcement, personal emails, phone calls, meeting invitations, the webpage of the Forest Centre (government) and through the forestry sector information portal.</i></p> <p><i>It shall be noted that there are no Indigenous Peoples in Estonia.</i></p>
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	<p>PEFC EST 1001:2020</p> <p>“6.4.4 Activities of the working group shall be organized in an open and transparent manner where a) working drafts of the standard shall be available to all members of the working group,”</p>
	Process	YES	<p>Explanation provided by EFCC</p> <p>“Working drafts of the standard were sent to the WG members before and after each meeting by e-mail.”</p> <p><i>The stakeholder survey confirmed that working group members were provided with all relevant documents in a timely manner.</i></p>
(b) all members of the working group shall be given meaningful opportunities to contribute to the development or revision of the standard and to provide feedback on working drafts, and	Procedures	YES	<p>PEFC EST 1001:2020</p> <p>“6.4.4 b) all members of the working group shall be given opportunities to practically contribute to the development or revision of the standard and provide feedback on the working drafts of the standard,”</p>
	Process	YES	<p><i>Evidence was found in minutes that various comments were provided by WG members. Respondents to the stakeholder survey also confirmed that they had been given meaningful opportunities to participate in the revision process.</i></p>
(c) feedback and views given by any member of	Procedures	YES	<p>PEFC EST 1001:2020</p> <p>“6.4.4 c) feedback and views given by any member of the working group shall be considered in an open and</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
the working group shall be considered in an open and transparent way where the outcome of these considerations is recorded.			transparent way and the outcome of these considerations shall be recorded.”
	Process	YES	<i>Minutes of WG meetings were found in which the views of various members of the WG are found. The stakeholder survey also confirmed that feedback and views of WG members were considered in an open and transparent manner.</i>
6.4.5 The decision of the working group to recommend the final draft for formal approval shall be taken on the basis of consensus. In order to determine whether there is any sustained opposition, the working group can utilise the following methods:			
(a) face-to face meeting(s) where there is a verbal yes/no vote, a show of hands for a yes/no vote; a statement on consensus from the Chair when there are no dissenting voices or hands (votes); a formal ballot, etc.,	Procedures	YES	PEFC EST 1001:2020 “6.4.5 Achieving a consensus in the steering group is the prerequisite for the decision of the Board of the standardising body (EFCC) to approve the final draft of the standard. In case there is no difference in opinion and no sustained opposition, the chairman of the meeting shall record the consensus as the decision of the meeting in the minutes of the meeting. In order to determine whether there is a consensus or any sustained opposition regarding the main issues, the steering group can use the following methods: a) convene 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) etc.;”
	Process	N.A.	<i>A combination of methods was used to reach consensus.</i>
(b) telephone conference meeting(s) where there is a verbal yes/no vote,	Procedures	YES	PEFC EST 1001:2020 “6.4.5 b) organise a meeting using information technology solutions enabling real-time two-way communication or other similar electronic methods where the members can give a verbal yes/no vote;”
	Process	N.A.	<i>A combination of methods was used to reach consensus.</i>
(c) e-mail request to the working group for agreement or objection	Procedures	YES	PEFC EST 1001:2020 “6.4.5 c) send an e-mail request to the members of the steering group for agreement or objection where the members provide a formal (written) response (vote) or”

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
where the members provide a formal (written) response (vote),	Process	N.A.	<i>A combination of methods was used to reach consensus.</i>
(d) combinations of these methods.	Procedures	YES	PEFC EST 1001:2020 “6.4.5 d) use combinations of these methods to be confirmed by the working group at the beginning of the standard setting process.”
	Process	YES	A5_Minutes of the Steering Group_27 April 2022 (Translated by Google Translate) “4. There were 8 members of the steering group present at the meeting and 2 voting by e-mail in favor of approving the standard, and 1 member of the steering group voting by e-mail was against. The steering group decided to send the PEFC Estonian sustainable forest management standard PEFC EST 1003:2022 for approval by the board of the Estonian Forest Certification Council.” <i>The steering group, which consist of 12 members of the WG, met on 27 April 2022 for the consensus reaching meeting. Votes were held during the face-to-face meeting and by email. Evidence of the voting form is found in the tender dossier.</i>
6.4.6 Where a vote is used in decision-making, the standard-setting procedures shall determine and include decision-making thresholds that quantifies consensus. The threshold must be consistent with the consensus definition (refer to 3.1). However, a majority vote cannot override sustained	Procedures	YES	PEFC EST 1001:2020 “6.4.6 In case the decision shall be made by voting the decision shall be taken when 2/3 majority of the members of the steering group participating in the meeting have given a yes vote. Each key stakeholder group (p 6.2.2.) has a maximum of 2 votes. Voting should be carried out at a meeting convened with a prior notice. When the stakeholder group has more than 2 representatives, the stakeholder group shall jointly decide who will participate in the voting. A majority vote cannot override sustained opposition in order to achieve consensus. Differences in opinion in the working group shall not go unnoticed. The decision can be made by consensus provided all differences in opinion are solved according to the methods specified in clauses 6.4.5 and 6.4.7 and 6.4.8 if necessary.”
	Process	YES	A5_Minutes of the Steering Group_27 April 2022 (Translated by Google Translate) “3. The suggestions made by the members of the steering group on the spot and the suggestions and questions sent by Ülle Läll via e-mail were discussed. The members present reached a consensus regarding the proposals and answers to the questions and supplemented and specified the version of the standard of 27.04.2022. Since one representative of non-governmental organizations belonging to the steering group (Ülle Läll – Estonian Chamber of Agriculture and Commerce) did not agree with the approval of the document in its current wording, it is impossible to

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
opposition in order to achieve consensus.			<p>reach a consensus. According to the standard PEFC EST 1001:2020, Preparation of the standard - requirements for point 6.4.6. it was proposed to use voting when making the decision to approve the text of the standard.</p> <p>That the contradiction is not with the entire interest group is shown by the fact that another representative of non-governmental organizations belonging to the steering group Mart Kelk (MTÜ Estonian Forestry Society) is in favor of approving the standard, and the representatives of interest groups of non-governmental organizations in the working group (MTÜ Ühinenud Eesti Metsataimetjatjad, MTÜ Estonian Metsauliõpilaste Selts, SA Loodushoiu Fond) are as well as by the approval of the standard. Organic Eesti did not submit a position by the deadline. Since Ülle Läll was not present at the meeting, it was not possible to immediately explain the reasons for the wording.</p> <p>The present members of the steering group decided to use voting when approving the standard and to take into account the views received via e-mail when making the decision. There were 8 members of the management group who were present in favor of voting, and none of those present were against. The members present decided to inform Ülle Lälli about the changes he introduced to the standard. 6 members of the steering group were present in favor, 1 member of the steering group was neutral, and 1 member of the steering group was against.</p> <p>4. There were 8 members of the steering group present at the meeting and 2 voting by e-mail in favor of approving the standard, and 1 member of the steering group voting by e-mail was against. The steering group decided to send the PEFC Estonian sustainable forest management standard PEFC EST 1003:2022 for approval by the board of the Estonian Forest Certification Council.”</p> <p>Explanation provided by EFCC</p> <p>“Because Ülle Läll had been elected to the steering group at the first meeting, and she had not responded to the last invitation to the working group and consensus-building meeting (where voting may be required), it was necessary to ensure the participation of all members of the steering group in the meeting. Eve Rebane called her and personally sent her the draft version of the standard of the last meeting (14.04.2022), although she has received it from the moderator of the WG. Since she still had not answered, Eve Rebane called and e-mailed again. On the day of the meeting, i.e. 27.04.22 in the early morning, she presented her comments and questions about the standard. She promised to participate in the meeting, but she did not. The working group discussed all the proposals and comments she submitted, and yes, the working group made some changes to the text of the 27.04.22 standard version.</p> <p>The moderator of the working group called her during the meeting and explained the whole process of the last two years in the WG and the responses of the working group, and there was an oral discussion about the feedback she gave. Despite the explanations given, she neither wanted to come to the meeting to vote nor to present her position in writing.</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>Ülle Läll (EPKK-s representative) personally did not participate in any working meeting, and there were a total of 32 meetings. EPKK's representative only participated in the first (mostly opening) meeting.</p> <p>Other representatives from the NGO's stakeholder group confirmed that they are in favour of approving the standard. Those who did not participate in the meeting sent their signed confirmations by e-mail on 27.04.2022. The steering group took them into account. Since 4 out of 6 organizations were in favour of approving the standard (1 did not present its position), we consider it no sustained opposition by the entire NGO stakeholder group.</p> <p>The NGO interest group consists of the following organizations:</p> <ul style="list-style-type: none"> - Eesti Põllumajandus-Kaubanduskoda - MTÜ Eesti Metsaüliõpilaste Selts - SA Loodushoiu Fond - MTÜ Eesti Metsaselts - MTÜ Ühinenud Eesti Metsataimetootjad - Organic Estonia (did not participate in the meeting or voting)" <p><i>The EFCC decided to use voting to make the decision on the approval of the final standard. In total 11 out of 12 steering group members voted, with 10 in favour and 1 against. This constitutes a 2/3 majority (10/12 yes votes) and meets the requirements of the standard setting procedures. Members of all stakeholder groups were present for voting. As described above, one NGO member (Ülle Läll) voted against the final version of the standard. EFCC discussed and implemented some of the views of this member before the final decision making. Despite substantial efforts from EFCC to get this member to come to the meeting to explain her point of view, she did not do so. As mentioned, she and her representative also only attended 1 out of 32 WG meetings. EFCC explained that the other NGO members were in favour of adopting the standard and that the stakeholder group as a whole had no sustained opposition. EFCC therefore concludes that no sustained opposition remained. The assessor concluded that considering the efforts made by EFCC to resolve the issue, their efforts to get into contact with the member for discussions, and the fact that this viewpoint was not shared by other NGOs, the no-vote is not considered sustained opposition.</i></p>
6.4.7 When there is sustained opposition to a substantial issue, the issue shall be resolved using the following methods:			
(a) finding a compromise through discussion and negotiation on the	Procedures	YES	<p>PEFC EST 1001:2020</p> <p>"6.4.7 Reaching a consensus shall be encouraged by the exchange of opinions between the members of the steering group and for example, combining different opinions by mutual consultations. When there is sustained opposition to a substantial issue, the issue shall be resolved using the following methods:</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
disputed issue within the working group,			a) finding a compromise through discussions and negotiations on the disputed issue;"
	Process	N.A.	<i>Consensus was reached in the working group and no sustained opposition on a substantial issue remained.</i>
(b) finding a compromise through direct negotiation between the stakeholder(s) making the objection and other stakeholders with different views on the disputed issue,	Procedures	YES	PEFC EST 1001:2020 "6.4.7 b) finding a compromise through direct negotiations with the stakeholders making the objection and other stakeholders with different views on the disputed issue;"
	Process	N.A.	<i>Consensus was reached in the working group and no sustained opposition on a substantial issue remained.</i>
(c) additional round(s) of public consultation (if necessary) where further stakeholder input can help to achieve consensus on unresolved issues. The standardising body determines the scope and duration of any additional public consultation.	Procedures	YES	PEFC EST 1001:2020 "6.4.7 c) additional round(s) of public consultation (if necessary) where further stakeholder input can help to achieve consensus on unresolved issues. The standardising body (EFCC) determines the scope and duration of any additional public consultation if necessary."
	Process	N.A.	<i>Consensus was reached in the working group and no sustained opposition on a substantial issue remained.</i>
6.4.8 When a substantial issue cannot be resolved and sustained opposition persists, the standardising body shall initiate dispute resolution in	Procedures	YES	PEFC EST 1001:2020 "6.4.8 When a substantial issue cannot be resolved and sustained opposition persists, the standardising body (EFCC) shall initiate dispute resolution in accordance with its procedures for impartial and objective action (p 5.3.)."
	Process	N.A.	<i>Consensus was reached in the working group and no sustained opposition on a substantial issue remained.</i>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
accordance with its procedures for impartial and objective action.			
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 ²¹ through suitable media,	Procedures	YES	PEFC EST 1001:2020 “6.5.1 The standardising body (EFCC) shall organize public consultation on the draft standard and shall ensure that: a) the start and the end dates of the public consultation are announced on the homepage pefc.ee a day before carrying out the public consultation at the latest;”
	Process	YES	Public Announcement 29 October 2021 on the EFCC website “Notice for conducting a 60-day opinion survey regarding the new PEFC Estonian sustainable forest management standard. (...) The opinion survey period lasts 60 days, from October 29 to December 28. The disclosure of the standard gives all stakeholders the opportunity to give feedback on the draft PEFC Estonian sustainable forest management standard and to make suggestions for improving the standard's requirements and indicators.” <i>Although the announcement was made on the same day as the start of the public announcement, the public consultation period lasted 61 in total and the intention of the requirement (60-day public consultation) is met.</i>
(b) a direct invitation to comment on the enquiry draft is sent to each stakeholder identified by stakeholder identification mapping (refer to 6.2) aiming for a balanced participation of stakeholder groups,	Procedures	YES	PEFC EST 1001:2020 “6.5.1 b) a direct invitation to comment on the draft standard is sent to each stakeholder having been identified by stakeholder identification mapping (refer to 6.2) aiming for a balanced participation of stakeholder groups;”
	Process	YES	<i>A direct email invitation (A13) to comment on the enquiry draft sent to all stakeholders identified by stakeholder identification mapping was found.</i>
	Procedures	YES	PEFC EST 1001:2020

²¹ 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)
(c) invitations are sent to disadvantaged and key stakeholders by methods that ensure they reach recipients and are easy to understand,			"6.5.1 c) invitations are sent to disadvantaged and key stakeholders by methods that ensure the invitations reach the recipients and are easy to understand;"
	Process	YES	<i>A direct email invitation (A13) to comment on the enquiry draft was sent to all stakeholders. Key and disadvantaged stakeholders have access to email in Estonia.</i>
(d) the enquiry draft is made publicly available,	Procedures	YES	PEFC EST 1001:2020 "6.5.1 d) the draft standard is made publicly available;"
	Process	YES	<i>The enquiry draft was made publicly available and accessible through the Public Announcement 29 October 2021 on the EFCC website.</i>
(e) public consultation is for at least 60 days,	Procedures	YES	PEFC EST 1001:2020 "6.5.1 e) public consultation lasts for at least 60 days;"
	Process	YES	<i>The public consultation started on 29 October 2020 and ended on 28 December 2020, a total of 61 days.</i>
(f) all feedback is considered by the working group in an objective manner, and	Procedures	YES	PEFC EST 1001:2020 "6.5.1 f) all feedback is considered by the working group in an objective manner"
	Process	YES	Minutes of the WG meeting 13 January 2022 (Translated with Google Translate) "Discussion of the feedback and suggestions received from the 60-day publication of the PEFC Estonian sustainable forest management standard PEFC EST 1003:20XX. Summary of the working group's decisions It was agreed at the meeting of the working group of the PEFC forest management standard: 1. The editor of the standard formulates the requirements and indicators that need to be clarified. 2. Describe the fulfillment of the requirements in the manual in more detail (through examples). 3. At the next meeting, the discussion of the proposals will be continued from point 8.4.7. Appendices: 1) The feedback report given to the standard during publication regarding the PEFC Estonian sustainable forest management standard draft V2 (PEFC EST 1003:20XX) 2) The working version of the standard v2.1. 13.01.22 result of the discussions of the meeting."

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<i>Various emails with feedback from stakeholders were found, as well as minutes from the working group in which feedback was discussed and a synopsis of feedback and answers. Respondents to the stakeholder survey confirmed that the working group operated in an objective and transparent manner.</i>
(g) a synopsis of feedback is compiled for each material issue, including the outcome of considering the issue. ²² The synopsis is made publicly available (e.g. on a website) and is sent to each stakeholder/party that gave feedback.	Procedures	YES	PEFC EST 1001:2020 “6.5.1 g) a synopsis of feedback is compiled by the developer of the draft standard specifying the opinions and proposals that have been considered and those that have not been considered. The synopsis is made publicly available on the website pefc.ee and is sent to each stakeholder/party that has given feedback.” <i>No reference was found that a synopsis of feedback is compiled for each material issue.</i>
	Process	YES	<i>A synopsis of all public comments received and the outcome of considering the issues is available on the EFCC website at: https://pefc.ee/wp-content/uploads/2022/06/PEFC-EST-1003_2022_60-paevase-avalikustamise-tagasiside-aruanne_Tooryhma-vastustega38623.pdf.</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 EST 1001:2020 “6.5.2 For new standards the standardising body (EFCC) shall organize a second round of public consultation specified in 6.5.1 lasting for at least 30 days.”
	Process	N.A.	<i>It shall be noted that during the standard setting process requirements for the certification of Trees Outside Forest (TOF) were developed. For this purpose EFCC held a 30-day public consultation period. However, the TOF requirements are not covered by the current assessment, because they are currently no longer part of the Estonian scheme.</i>
6.6 The standardising body shall organise pilot testing of new standard(s) ²³ to assess the clarity, auditability and feasibility of the requirements. The	Procedures	YES	PEFC EST 1001:2020 “6.6 The standardising body (EFCC) shall organize 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>It shall be noted that during the standard setting process requirements for the certification of Trees Outside Forest (TOF) were developed. For this purpose EFCC conducted an elaborate pilot testing of the requirements. However, the</i>

²² 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.


²³ 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)
working group shall consider the outcome of pilot testing.			<i>TOF requirements are not covered by the current assessment, because they are currently no longer part of the Estonian scheme.</i>
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 EST 1001:2020 “7.1 The general meeting of the standardising body (EFCC) shall formally approve the standard or normative document as soon as there is evidence of consensus among the steering group.”
	Process	YES	A5_Minutes of the SFM Working Group 27 April 2022 (Translated by Google Translate) “4. Consensus voting 4. There were 8 members of the steering group present at the meeting and 2 voting by e-mail in favor of approving the standard, and 1 member of the steering group voting by e-mail was against. The steering group decided to send the PEFC Estonian sustainable forest management standard PEFC EST 1003:2022 to the board of the Estonian Forest Certification Council for approval.” A23_Minutes of the Board Meeting of EFCC 4 May 2022 (Translated by Google Translate) “2.2. Approval of PEFC Estonian Forest Certification Scheme The PEFC Estonian Forest Certification Scheme consists of the following standards and procedures: PEFC EST 1001:2020, Standard setting – Requirements PEFC EST 1002:2022, Group forest management certification – Requirements PEFC EST 1003:2022, Sustainable forest management – Requirements PEFC EST 1004:2022, Requirements for certification bodies operating PEFC forest management certification PEFC EGD 1005:2022, Issuance of PEFC trademarks usage licences by Estonian Forest Certification Council PEFC EGD 1006:2022, EFCC Notification of Certification Bodies operating Chain of Custody and Forest Management Certification in Estonia against the requirements of the Estonian Forest Certification Scheme PEFC EGD 1007:2022, Complaints and Appeals Settlement Procedure PEFC ST 2002:2020, Chain of Custody of Forest Based Products – Requirements PEFC ST 2001:2020, PEFC Trademark rules – Requirements PEFC ST 2003:2020, Requirements for Certification Bodies operating Certification against the PEFC International Chain of Custody Standard

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>Vote. 4 in favour, 0 against, 0 abstentions.”</p> <p>A24_Minutes of the General Assembly 4 May 2022 (Translated by Google Translate)</p> <p>“DECISION 11.: To approve the Estonian Forest Certification Scheme in the following composition:</p> <p>PEFC EST 1001:2020, Standard setting – Requirements</p> <p>PEFC EST 1002:2022, Group forest management certification – Requirements</p> <p>PEFC EST 1003:2022, Sustainable forest management – Requirements</p> <p>PEFC EST 1004:2022, Requirements for certification bodies operating PEFC forest management certification</p> <p>PEFC EGD 1005:2022, Issuance of PEFC trademarks usage licences by Estonian Forest Certification Council</p> <p>PEFC EGD 1006:2022, EFCC Notification of Certification Bodies operating Chain of Custody and Forest Management Certification in Estonia against the requirements of the Estonian Forest Certification Scheme</p> <p>PEFC EGD 1007:2022, Complaints and Appeals Settlement Procedure</p> <p>PEFC ST 2002:2020, Chain of Custody of Forest Based Products – Requirements</p> <p>PEFC ST 2001:2020, PEFC Trademark rules – Requirements</p> <p>PEFC ST 2003:2020, Requirements for Certification Bodies operating Certification against the PEFC International Chain of Custody Standard</p> <p>7 in favour, 0 against, 0 abstentions.”</p> <p><i>The working group reached consensus on 27 April 2022, see also assessor’s comment under PEFC Benchmark requirement 6.4.6. After the standard had been formally approved by the General Meeting/General Assembly of the EFCC on May 4th 2022, some structural changes were required by PEFC International. Minutes were found of discussions on these points in the working group, as well as consensus within the working group followed by approval of the board and the general assembly of the EFCC (documents A35 and A36 on 21 June 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	Procedures	YES	<p>PEFC EST 1001:2020</p> <p>“7.2.1 The standardising body (EFCC) shall publish the formally approved standard/normative document and make these publicly available at no cost within 14 days of approval.”</p>
	Process	YES	<p>Explanation provided by EFCC</p> <p>“Documents were published 05.05.22 and 29.06.2022”</p>



PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
otherwise defined by the standardising body.			<i>The two approved versions of the standard (first approved and second approved version) were made available within 14 days of the formal approval on the EFCC website. The standard can be downloaded free of charge at: https://pefc.ee/avasta-pefc/pefc-skeemi-dokumendid/</i>
7.2.2 Standard(s) shall include:			
(a) identification and contact information for the standardising body,	Procedures	YES	PEFC EST 1001:2020 “7.2.2 The standard shall include: a) identification and contact information for the standardising body (EFCC);”
	Process	YES	PEFC EST 1003:2022 
(b) official language of the standard,	Procedures	YES	PEFC EST 1001:2020 “7.2.2 b) an indication to the official language of the standard;”
	Process	YES	PEFC EST 1003:2022 “The official version of this document is Estonian”
(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 EST 1001:2020 “7.2.2 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;”
	Process	YES	PEFC EST 1003:2022 “(…) however, the document has been translated into English. In case of any doubt the English version is definitive.”
	Procedures	YES	PEFC EST 1001:2020 “7.2.2 d) the approval date and the date of next periodic review of the standard.”

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
(d) The approval date and the date of next periodic review ²⁴	Process	YES	PEFC EST 1003:2022 "Approved by: Estonian Forest Certification Council Date: 04.05.2022 Date of next periodic review: 04.05.2027"
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 EST 1001:2020 "7.2.3 Printed copies of the standard shall be made available upon request at a price that covers no more than administrative costs (if any)."
	Process	YES	PEFC EST 1003:2022 "This document is freely available from the Estonian Forest Certification Council website www.pefc.ee . The translation of this document can be obtained from the Estonian Forest Certification Council or from the website www.pefc.org ."
7.2.4 The standardising body shall make the development report (refer to PEFC GD 1007) publicly available	Procedures	YES	PEFC EST 1001:2020 "7.2.4 The standardising body (EFCC) shall make the development report of the standard setting (refer to PEFC GD 1007) publicly available."
	Process	YES	<i>The development report was found on the website of EFCC (www.pefc.ee).</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	Procedures	YES	PEFC EST 1001:2020 "8.1 The standard/normative document shall be reviewed at intervals that do not exceed a five-year period. The review shall be based on the consideration of the feedback received during the implementation of the standard and a gap analysis. If necessary, a repeated request for stakeholder feedback shall be made to obtain further feedback and input."
	Process	YES	Announcement of the standard review process on the website of EFCC 14 November 2019 "The board of the Estonian Forest Certification Council of the NGO (EMSN) decided at its meeting on October 24 to start reviewing the PEFC Estonian Forest Certification Scheme with the aim of ensuring that the requirements stated in the standards meet the requirements of the PEFC international scheme."

²⁴ 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)
implementation and a gap analysis. If necessary, a stakeholder consultation shall be organised to obtain further feedback and input.			A25_Resolution of GA to start revision_21.01.2020 "3. Compliance with the requirements of the national PEFC Forest Certification Scheme with PEFC international requirements must be reviewed periodically and updated if necessary. The deadline for starting the review of the requirements of the Estonian Forest Certification Scheme was November 14, 2019. The board of EMSN made the corresponding decision on the process of starting with the review of the scheme's requirements at its meeting on October 24. The revision must be carried out within 2 years at the latest, i.e. by November 14, 2021." <i>The next periodic review date of the EFCS was on 14 November 2019 as a result of the approval date of the revised SFM benchmark standard PEFC ST 1003. The decision to review the EFCS was made on 24 October 2019, and was therefore made on time. Stakeholder feedback and a gap analysis were found.</i>
8.2.1 The standardising body shall establish and maintain a permanent mechanism for collecting and recording feedback on a standard. This mechanism shall be accessible on the website of the standardising body and/or PEFC National Governing Body with clear directions for providing feedback. ²⁵	Procedures	YES	PEFC EST 1001:2020 "8.2.1 The standardising body (EFCC) shall establish and maintain a permanent mechanism for collecting and recording feedback on the standard. Information on collecting and processing feedback shall be accessible on the standardising body (EFCC) website pefc.ee with clear directions for providing feedback. Note: Feedback can be sent in various formats: comments, requests for clarification and/or interpretation, complaints, etc."
	Process	NO	Decision of the Board 20-01-2020 (Translated by Google Translate) "PROCEDURE FOR COLLECTING OPINIONS ABOUT THE STANDARDS OF THE ESTONIAN FOREST CERTIFICATION COUNCIL AND HANDLING RECEIVED OPINIONS 1. Opinions received through all possible channels, including meetings, training courses, etc., are collected, recorded and analyzed in the preparation of the standard. 2. Opinions and suggestions about standards can be submitted to EMSN in writing at Toompuiestee 24, 10149 Tallinn or by e-mail at info@pefc.ee. 3. EMSN confirms receipt of the opinion by sending a confirmation e-mail to the sender of the opinion. 4. EMSN keeps a record of the received opinions on each standard of the Estonian Forest Certification Scheme in a separate document. 5. Received opinions are gathered and analyzed.

²⁵ 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)
			<p>6. Received opinions are discussed at the board meeting, standards working groups and the standard's steering group.</p> <p>7. EMSN provides feedback on the opinion to the sender of the opinion."</p> <p>Feedback page on the EFCC website: Thank you for contacting us.</p> <p>"Eesti Metsasertifitseerimise Nõukogu MTÜ</p> <p>Registrikood: 80157862</p> <p>info@pefc.ee</p> <p>+372 529 7807</p> <p>Toompuiestee 24, 10149 Tallinn, Eesti"</p> <p>Explanation provided by EFCC</p> <p>"For the sake of clarity and transparency, we intend to complement the scheme documents block on the homepage with instructions and an additional opportunity to express an opinion on the standard-setting procedure.</p> <p>https://pefc.ee/avasta-pefc/pefc-skeemi-dokumendid/"</p> <p><i>A mechanism for collecting feedback was found in the decision of the board meeting. However, it seems that this information is not easily found on the website of EFCC and it is therefore unclear to stakeholders which methods they have to provide feedback. EFCC has commented that they intend to add this.</i></p>
8.2.2 All feedback received through all channels, including meetings, training courses, etc. shall be recorded and considered.	Procedures	YES	<p>PEFC EST 1001:2020</p> <p>"8.2.2 All feedback received through various channels, including meetings, training courses, etc. shall be collected, recorded and analysed in standard setting process."</p>
	Process	YES	<p>Explanation provided by EFCC</p> <p>"Additionally, there have been questions about how to implement the standard, and EFCC has compiled answers (managing key habitats, CITES, introducing Chaga, fellings in springs etc)."</p> <p><i>A document was found in which feedback received on the different documents of the EFCS is recorded.</i></p>
8.3.1 At the start of a review, the standardising body shall evaluate the standard against appropriate PEFC International	Procedures	YES	<p>PEFC EST 1001:2020</p> <p>"8.3.1 At the start of a review, the standardising body (EFCC) shall evaluate the standard against appropriate PEFC international standards, national laws and regulations, and other relevant standards to identify potential gaps in the standard."</p>
	Process	YES	<p>A28_Gap Analysis PEFC EST 1003:2015</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
standards, national laws and regulations, and other relevant standards to identify potential gaps in the standard.			<p>“Changes between the PEFC international standards PEFC ST 1003:2010 and PEFC ST 1003:2018, and compliance of the requirements of the currently valid EST National Forest Management Standard with the 2010 international standard PEFC ST 1003:2010.”</p> <p><i>The gap analysis was seen and provides evidence that the standard was evaluated against PEFC International standards, national laws and regulations, and other relevant standards to identify potential gaps.</i></p>
8.3.2 The standardising body shall consider the latest scientific knowledge, research and relevant emerging issues.	Procedures	YES	<p>PEFC EST 1001:2020</p> <p>“8.3.2 The standardising body (EFCC) shall consider the latest scientific knowledge, research and relevant emerging issues.”</p>
	Process	YES	<p>Explanation provided by EFCC</p> <p>“Each member of the working group contributed their expertise.”</p> <p><i>Evidence was found that the working group included three members of the scientific and technological community.</i></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 include the gap analysis in the stakeholder consultation.	Procedures	YES	<p>PEFC EST 1001:2020</p> <p>“8.4.1 Where the feedback and the gap analysis do not identify a need to revise the standard, the standardising body (EFCC) shall organize stakeholder consultation to determine whether stakeholders see a need for revising the standard. The standardising body (EFCC) shall include the results of the gap analysis in the stakeholder consultation.”</p>
	Process	N.A.	<p><i>The gap analysis identified the need to revise the standard. No stakeholder consultation was needed to identify whether a revision was needed.</i></p>
	Procedures	YES	PEFC EST 1001:2020

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
8.4.2 At the start of a review, the standardising body shall update the stakeholder identification mapping (refer to clause 6.2).			"8.4.2 At the start of a review, the standardising body (EFCC) shall update the stakeholder identification mapping (refer to clause 6.2)."
	Process	YES	A1_Stakeholder mapping EFCC 21.01.2020 "Mapping of stakeholders involved in the renewal of the PEFC Estonian Forest Certification Scheme 1. According to PEFC EST 1001:2020 p 6.2.1, "EMSN defines the stakeholders according to the objectives and scope of the standard preparation activities using the stakeholder mapping method, which allows to determine which stakeholders and topics are related and in what way." EMSN decides which are the main interest groups, their likely main questions and which means of information are best to reach them." 2. According to PEFC EST 1001:2020 p 6.2.3, "EMSN identifies disadvantaged stakeholders and key stakeholders and addresses limitations that may prevent their participation in activities related to the development of the standard." <i>An elaborate update and stakeholder map were found in the tender dossier.</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 EST 1001:2020 "8.4.3 The standardising body (EFCC) shall organize: a) a public consultation period of at least 30 days (following the requirements of clause 6.5.1) and/or"
	Process	N.A.	<i>The gap analysis identified the need to revise the standard. No stakeholder consultation was needed to identify whether a revision was needed.</i>
(b) stakeholder meetings.	Procedures	YES	PEFC EST 1001:2020 "8.4.3 b) stakeholder meetings."
	Process	N.A.	<i>The gap analysis identified the need to revise the standard. No stakeholder consultation was needed to identify whether a revision was needed.</i>
8.4.4 The standardising body shall announce the review in a timely manner (refer to 6.3).	Procedures	YES	PEFC EST 1001:2020 "8.4.4 The standardising body (EFCC) shall make an announcement at least 14 days before the start of the review (vt 6.3)."
	Process	YES	Announcement of the standard review process on the website of EFCC 14 November 2019

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>"The board of the Estonian Forest Certification Council of the NGO (EMSN) decided at its meeting on October 24 to start reviewing the PEFC Estonian Forest Certification Scheme with the aim of ensuring that the requirements stated in the standards meet the requirements of the PEFC international scheme."</p> <p><i>EFCC announced the review process on 14 November 2019, the first standard setting activity of the working group took place on 10 March 2020. This is therefore in a timely manner.</i></p>
8.5.1 Based on the feedback received during the period of a standard's implementation, the outcome of the gap analysis and the consultations, the standardising body shall decide whether to reaffirm the standard or whether a revision of the standard is necessary.	Procedures	YES	<p>PEFC EST 1001:2020</p> <p>"8.5.1 Based on the feedback received during the period of the implementation of the standard, the outcome of the gap analysis and the consultations, the standardising body (EFCC) shall decide whether to reaffirm the standard or whether a revision of the standard is necessary."</p>
	Process	YES	<p>A29_Minutes of the EFCC GA meeting 21-01-2020</p> <p>"5. Decision of the general meeting on approving the currently valid Estonian PEFC Forest Certification Scheme or starting the revision process of the scheme</p> <p>Eve Rebane gave an overview of the changes in international standards and the standards that are currently being changed, as well as the feedback from interest groups in the implementation of the standards and the analysis of the changes. (Appendix 7, Decision of the General Meeting in a separate form)</p> <p>A vote on whether:</p> <p>1. to approve the currently valid PEFC Estonian Forest Certification Scheme without changes</p> <p>or</p> <p>2. start the revision process of the PEFC Estonian Forest Certification Scheme according to point 9.1 of PEFC ST 1001:2017. (regular change).</p> <p>0 members voted for item 1.</p> <p>All members voted in favor of item 2.</p> <p>DECISION 5.1.: Start the revision process of the PEFC Estonian Forest Certification Scheme according to point 9.1 of PEFC ST 1001:2017. (regular change)."</p>
8.5.2 The decision shall be made at the highest decision-making level of the standardising body	Procedures	YES	<p>PEFC EST 1001:2020</p> <p>"8.5.2 The decision shall be made by the general meeting of the standardising body (EFCC)"</p> <p>Statute of EFCC</p> <p>"5.1. The highest body of the association is the general meeting of members (...)"</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
	Process	YES	<i>The decision was made by the General Assembly of the EFCC which is the highest decision-making level of the organisation.</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 EST 1001:2020 "8.5.3 When the standardising body (EFCC) has decided to reaffirm a standard, the standardising body (EFCC) shall provide a justification for the decision and make the justification publicly available."
	Process	N.A.	<i>The standard was not reaffirmed.</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 EST 1001:2020 "8.5.4 When EFCS has decided to revise the standard, the standardising body (EFCC) shall specify the type of revision (normal or editorial revision)."
	Process	YES	A29_Minutes of the EFCC GA meeting 21-01-2020 "DECISION 5.1.: Start the revision process of the PEFC Estonian Forest Certification Scheme according to point 9.1 of PEFC ST 1001:2017. (regular change)."
Revision of standards			
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	Procedures	YES	PEFC EST 1001:2020 "9.1 Procedures for the revision of the standard/normative document 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."
	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>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
revisions and time-critical revisions.			
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	PEFC EST 1001:2020 "9.2 Editorial revisions can be made without triggering the normal revision process. The standardising body (EFCC) shall approve the editorial changes formally and publish an amendment or a new edition of the standard."
	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	PEFC EST 1001:2020 "9.3.1 A time-critical revision is a revision between two periodic reviews using a fast-track process."
	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:			
(a) Change in national laws and regulations affecting compliance with PEFC International requirements	Procedures	YES	PEFC EST 1001:2020 "9.3.2 A time-critical revision can be conducted only in the following situations: a) Change in national laws and regulations affecting compliance with PEFC International requirements;"
	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 EST 1001:2020 "9.3.2 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>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
9.3.3 The time-critical revision shall follow these steps:			
(a) The standardising body shall draft the revised standard,	Procedures	YES	PEFC EST 1001:2020 “9.3.3 The time-critical revision shall follow these steps: a) The standardising body (EFCC) 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 EST 1001:2020 “9.3.3 b) The standardising body (EFCC) 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 EST 1001:2020 “9.3.3 c) The revised standard shall be approved formally by the general meeting of the standardising body (EFCC),”
	Process	N.A.	<i>No time critical revision was conducted, instead, a normal revision process was conducted.</i>
(d) The standardising body shall explain the justification for the urgent change(s) and make the justification publicly available.	Procedures	YES	PEFC EST 1001:2020 “9.3.3 d) The standardising body (EFCC) shall explain the justification for the urgent changes 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 EST 1001:2020 “9.4.1 A revision shall define the application date and transition period of the revised standard/normative document.”
	Process	YES	PEFC EST 1003:2022 “Document name: PEFC Estonia Sustainable Forest Management Standard Document title: PEFC EST 1003:2022 Approved by: Estonian Forest Certification Council Date: 04.05.2022

PEFC Conformity Assessment of the Estonian Forest Certification Scheme

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			Issue date: 05.05.2022 Amended: 21.06.2022 Date of entry into force: 04.05.2023 Transition period: 04.05.2024 Date of next periodic review: 04.05.2027"
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 EST 1001:2020 "9.4.2 The application date of the standard shall not be more than one year after the publication of the standard. This allows time for endorsement of the revised standard/normative document, introduction of change(s), information dissemination and training."
	Process	YES	PEFC EST 1003:2022 "Document name: PEFC Estonia Sustainable Forest Management Standard Document title: PEFC EST 1003:2022 Approved by: Estonian Forest Certification Council Date: 04.05.2022 Issue date: 05.05.2022 Amended: 21.06.2022 Date of entry into force: 04.05.2023" <i>The standard was published on 5 May 2022. The date of entry into force (application date) is on 4 May 2023. The application date is therefore 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 exceptional circumstances.	Procedures	YES	PEFC EST 1001:2020 "9.4.3 The transition period shall not exceed one year. The standardising body (EFCC) may determine a longer period when justified by exceptional circumstances."
	Process	YES	PEFC EST 1003:2022 "Date of entry into force: 04.05.2023 Transition period: 04.05.2024" <i>The transition period ends exactly one year after the day of entry into force, and therefore 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	YES	PEFC EST 1002:2022 “4. Context of group certification 4.1. The group entity shall determine the basis for the establishment of the group. It can be based on, for example, a region”
b) other groups and/or	YES	PEFC EST 1002:2022 “ 4.1. The group entity shall determine the basis for the establishment of the group. It can be based on, for example (...) objectives or principles.”
c) whether there are any other specific circumstances which influence the implementation of the group management system.	YES	PEFC EST 1002:2022 “ 4.1. The group entity shall determine the basis for the establishment of the group. It can be based on, for example (...) objectives or principles.”
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 EST 1002:2022 “6. Planning 6.2.1. The group entity shall identify the affected stakeholders who are relevant to the group management system and their expectations”
b) the relevant expectations of these affected stakeholders.	YES	PEFC EST 1002:2022 “6.2.1. The group entity shall identify the affected stakeholders who are relevant to the group management system and their expectations”



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
4.3 Determining the scope of the group management system		
4.3.1 The standard shall provide definitions relating to the following terms, which are in conformity with the definitions of those terms presented in chapter 3:		
a) the group organisation and the elements of the group organisation (group entity and participant),	YES	<p>PEFC EST 1002:2022</p> <p>“3. Terms and Definitions</p> <p>Organization</p> <p>A legal or natural person holding a PEFC certificate, participating in group certificate or applying for certification and being responsible for meeting the requirements of the forest certification scheme</p> <p>Group entity. An entity that represents the organizations participating in certification.</p> <p>Group. A group consists of organizations and a group entity sharing common objectives for sustainable forest management.</p> <p>Group entity</p> <p>A legal entity that represents the organisations participating in certification.</p> <p>5.1.1. The group entity shall draw up the principles of the group management system and designate the person(s) responsible for meeting the requirements of the group standard.</p> <p>5.2.1.1 The group entity shall</p> <p>a) ensure the implementation of a up to date and appropriate management system;</p> <p>b) represent the group organizations in the certification process;</p> <p>f) to conclude a written agreement with the organization which shall include the organisation’s commitment to comply with the forest certification scheme,</p> <p>h) to provide all organizations with information and guidance required for the effective implementation and maintenance of the forest certification scheme;</p> <p>k) to take relevant corrective actions to respond to nonconformities identified in the course of the internal audit;”</p> <p><i>The definition of a group meets the PEFC benchmark definition through the additional clauses 5.1.1, 5.2.1.1b and 5.2.1.1f. The definition of group entity is complemented with clauses 5.1.1, 5.2.1.1a, b, f, h, and k.</i></p>
b) the certified area,	YES	PEFC EST 1002:2022

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		"3. (...) Certified area. The area owned and/or held by the organization subject to compliance with the requirements of the PEFC Standard. In the context of group certification the certified area is the total forest area of the organizations participating in certification covered by a group forest certificate."
c) the group certificate and	YES	PEFC EST 1002:2022 "3. (...) Group certificate. A certificate issued to the group entity by an accredited certification body confirming that the organizations participating in the group comply with the requirements of the forest certification scheme"
d) the document confirming participation in group certification.	YES	PEFC EST 1002:2022 "3. (...) Document confirming participation in group forest management certification Documented information confirming participation in group certification. Documented information can be, for example, an e-mail, a note on the website of the group entity, PEFC International or EFCC or any other document confirming participation. 5.2.1.1 The group entity shall g) to provide all organizations with a document confirming participation in group certification; 5.2.2.1. The organization shall a) implement the requirements of the forest certification scheme and group management system and conclude a written agreement with the group entity on the requirements;"
4.3.2 The standard requires that for the establishment of the scope for the group management system the boundaries and applicability of the group management system shall be determined.	YES	PEFC EST 1002:2022 "4.2.1. For the establishment of the scope for the group management system the group entity shall determine the boundaries and applicability of the group management system."
4.3.3 The standard shall define which requirements of the sustainable forest management standard may be fulfilled on group level.	YES	PEFC EST 1002:2022 "4.3. The following requirements of the PEFC Estonia Sustainable Forest Management Standard can be implemented on group level: 4.3.1. Forest Management Standard clause 5.2. (...) Indicators to be implemented on group level: the confirmation has been published on the website of the group entity or EFCC or in another publicly available register/database. 4.3.2. Forest Management Standard clause 5.3. (...) Indicators to be implemented on group level: the principles of the management system have been developed and the responsible person(s) has/have



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>been appointed. The group entity is able to provide no less than the following information: the structure of the organization, per-son(s) responsible for meeting the requirements of the PEFC standard, principles of document management, principles of communication with the local community, principles of carrying out an internal audit, principles of dispute and complaint resolution.</p> <p>4.3.3. Forest Management Standard clause 6.2.1.: (...) Indicators to be implemented on group level: the group entity has identified affected stakeholders, their potential needs and expectations.</p> <p>4.3.4 Forest Management Standard clause 6.3.2.: (...) Indicators to be implemented on group level: the group entity has established policies contributing to reducing the risk of damage to and the deterioration of the state of the forest as an eco-system and contributing to ensuring the good condition of the forest as an ecosystem in a longer term.</p> <p>4.3.5 Forest Management Standard clause 6.3.3. (...) Indicators to be implemented on group level: (a) the confirmation sentence can be found on the websites of the group entity, EFCC or in another publicly available register/database; (e) the group entity has set out in writing long-term objectives for sustainable forest management;</p> <p>4.3.6 Forest Management Standard clause 6.3.6.: (...) Indicators to be implemented on group level: the information has been published on the website of the group entity and/or EFCC or in another publicly available register/database.</p> <p>4.3.7. Forest Management Standard clause 9.1.1.: (...) Indicators to be implemented on group level: the quality of forest management work and the im-pact on forest and key ecosystem services has been evaluated. The results of the evaluation have been taken into account in the planning and execution of forest management work. The organization has set monitoring frequency.</p> <p>4.3.9 Forest Management Standard clause 9.3.1.: (...) Indicators to be implemented on group level: the group management system is functioning effectively. Necessary corrective measures have been taken. Trends, non-conformities and corrective measures, as well as possibilities for con-stant improving of the group management system have been discussed at management level. Decisions on continuous improvement of the group management system, as well as making amendments to the group management system if applicable, have been made. The results of the review by the management have been documented."</p> <p><i>Each clause is cited in the Group Forest Management document (left out in the references above).</i></p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
4.3.4 The standard requires that the scope shall be made available as documented information.	YES	PEFC EST 1002:2022 "4.2.2. The scope of the group management system is 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 EST 1002:2022 "4.5. The group entity shall carry out monitoring and internal audit of all group members. 9.1.1. 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."
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 EST 1002:2022 "4.4 The group entity shall also have established a chain of custody system provided the group entity acts as a trader of forest based material not covered by the group certificate"
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 EST 1002:2022 "5.1.1. The group entity shall draw up the principles of the group management system and designate the person(s) responsible for meeting the requirements of the group standard. Indicators to be implemented on group level: the group entity shall be able to provide no less than the following information: group structure, responsibilities of the group entity, person(s) responsible for the requirements of the PEFC standard, principles of document management, principles of communication with the local community, principles of internal audit, disputes and complaints. 5.1.2. The group entity shall provide a commitment to integrate the requirements of the group certification into the requirements of the group management system; 5.2.2.1. The organization shall a) implement the requirements of the forest certification scheme and group management system and conclude a written agreement with the group entity on the requirements;"

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
b) to represent the group organisation in the certification process, including in communications and relationships with the certification body, submission of an application for certification, and contractual relationship with the certification body;	YES	PEFC EST 1002:2022 "5.2.1.1 The group entity shall b) represent the group organisations in the certification process; Note: Representation means, among other things, communication with the certification body, submission of an application for certification, and contractual relationship with the certification body"
c) to establish written procedures for the management of the group organisation;	YES	PEFC EST 1002:2022 "5.1.1. The group entity shall draw up the principles of the group management system and designate the person(s) responsible for meeting the requirements of the group standard. Indicators to be implemented on group level: the group entity shall be able to provide no less than the following information: group structure, responsibilities of the group entity, person(s) re-sponsible for the requirements of the PEFC standard, principles of document management, principles of communication with the local community, principles of internal audit, disputes and complaints. 5.1.2. The group entity shall provide a commitment to integrate the requirements of the group certification into the requirements of the group management system;"
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 EST 1002:2022 "5.2.1.1 The group entity shall c) establish written procedures for the acceptance of new participants of the group organization and for resigning membership. e) to keep documented information of: b. the data of all organizations, including their contact details, cadastral code and the size of forest area 5.2.2.1. The organization shall c) 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;"
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 EST 1002:2022 "5.2.1.1 The group entity shall d) establish written procedures for the suspension and exclusion of the organization participating in group certification who do not correct or close nonconformities. Organizations excluded from any

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		certification group based on nonconformities cannot be accepted in the group within 12 months after exclusion."
<p>f) to keep documented information of:</p> <p>i. the group entity and participants' conformity with the requirements of the sustainable forest management standard, and other applicable requirements of the forest certification system,</p> <p>ii. all participants, including their contact details, identification of their forest property and its/their size(s),</p> <p>iii. the certified area,</p> <p>iv. the implementation of an internal monitoring programme, its review and any preventive and/or corrective actions taken;</p>	YES	<p>PEFC EST 1002:2022</p> <p>"5.2.1.1 The group entity shall</p> <p>e) to keep documented information of:</p> <p>a. the conformity of the group entity and the organizations with the requirements of the sustainable forest management standard, and other applicable requirements of the forest certification scheme;</p> <p>b. the data of all organizations, including their contact details, cadastral code and the size of forest area</p> <p>c. the implementation of group internal monitoring programme, its review and any preventive and/or corrective actions taken;</p> <p>d. the certified area."</p>
<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'</p>	YES	<p>PEFC EST 1002:2022</p> <p>"5.2.1.1 The group entity shall</p> <p>f) to conclude a written agreement with all organisations which shall include the organisations' commitment to comply with the forest certification scheme, as well as the right of the group entity to implement and enforce any corrective or preventive measures, and to initiate the exclusion of any organisation from the group in the event of nonconformity with the forest certification scheme"</p>

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
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.		
h) to provide all participants with a document confirming participation in the group forest certification;	YES	PEFC EST 1002:2022 "5.2.1.1 The group entity shall g) to provide all organizations with a document confirming participation in group certification"
i) to provide all participants with information and guidance required for the effective implementation and maintenance of the sustainable forest management standard and other applicable requirements of the forest certification system;	YES	PEFC EST 1002:2022 "5.2.1.1 The group entity shall h) to provide all organizations with information and guidance required for the effective implementation and maintenance of the forest certification scheme"
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 EST 1002:2022 "5.2.1.1 The group entity shall i) to address nonconformities reported by group members which were identified under other PEFC certifications than the particular group certification or nonconformities identified by the certification body and to ensure implementation with all group organizations"
k) to operate an internal monitoring programme that provides for the evaluation of the participants' conformity with the certification requirements;	YES	PEFC EST 1002:2022 "5.2.1.1 The group entity shall j) to operate an internal monitoring programme that provides for the evaluation of the organisations' and group entity's conformity with the requirements of the forest certification scheme; p) to operate an annual internal audit programme covering both group members and group entity"
l) to operate an annual internal audit programme covering both group members and group entity;	YES	PEFC EST 1002:2022 "5.2.1.1 The group entity shall p) to operate an annual internal audit programme covering both group members and group entity;"

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
m) to operate a management review of the group forest certification and acting on the results from the review;	YES	<p>PEFC EST 1002:2022</p> <p>“4.3. The following requirements of the PEFC Estonia Sustainable Forest Management Standard can be implemented on group level:</p> <p>4.3.9 Forest Management Standard clause 9.3.1.: The organization shall annually review the management system; the review decision shall include the current situation concerning the activities taken as a result of the previous management review, changes in inputs and internal functioning important for the management system, opportunities and decisions for continuous improvement of the management system, and information about the performance of the activities of the organization, including trends in non-conformities and corrective measures, as well as monitoring and internal audit results identified in the previous audit.</p>
n) to provide full co-operation and assistance in responding effectively to all requests from the certification body, accreditation body, PEFC International or the National Governing Body for relevant data, documentation or other information; allowing access to the forest area covered by the group organisation and other facilities, whether in connection with formal audits or reviews or otherwise related or with implications for the management system.	YES	<p>PEFC EST 1002:2022</p> <p>“5.2.1.1 The group entity shall</p> <p>l) to provide full co-operation and assistance in responding effectively to all justified requests from the certification body, accreditation body, PEFC International or the EFCC for relevant data, documentation or other information.</p> <p>m) allowing access to the forest area covered by the group organisation and other facilities, whether in connection with audits or reviews or otherwise related or with implications for the group management system.</p> <p>5.2.2.1. The organization shall</p> <p>c) 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 audits or re-views or otherwise related or with implications for the management system;”</p>
<p>5.1.2 Function and responsibilities of participants</p> <p>The standard requires that the following functions and responsibilities of the participants shall be specified:</p>		
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	<p>PEFC EST 1002:2022</p> <p>“5.2.1.1 The group entity shall</p> <p>f) to conclude a written agreement with the organization which shall include the organisation's commitment to comply with the forest certification scheme</p>

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.		5.2.2.1. The organization shall a) implement the requirements of the forest certification scheme and group management system and conclude a written agreement with the group entity on the requirements 5.2.2.2. An organization excluded from a certification group cannot apply for group membership within 12 months after exclusion.”
b) To provide the group entity with information about previous group participation.	YES	PEFC EST 1002:2022 “5.2.2.1. The organization shall b) to provide the group entity with information about previous participation in group certification”
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 EST 1002:2022 “5.2.1.1 The group entity shall f) to conclude a written agreement with the organization which shall include the organisation’s commitment to comply with the forest certification scheme 5.2.2.1. The organization shall a) implement the requirements of the forest certification scheme and group management system and conclude a written agreement with the group entity on the requirements”
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 EST 1002:2022 “5.2.2.1. The organization shall c) 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 audits or reviews or otherwise related or with implications for the management system”

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
e) to inform the group entity about nonconformities identified under other PEFC certifications than the particular group certification.	YES	PEFC EST 1002:2022 "5.2.2.1. The organization shall d) inform the group entity about nonconformities which were identified by the certification body under other PEFC certifications than the particular group certification"
f) to implement relevant corrective and preventive actions established by the group entity.	YES	PEFC EST 1002:2022 "5.2.2.1. The organization shall e) to implement relevant corrective and preventive actions established 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 EST 1002:2022 "6.5. The group entity shall make the summary of the group management plan publicly available. The management plan shall include no less than (a) an obligation to comply with the requirements of the PEFC standard and other applicable requirements of the forest certification scheme"
b) to integrate the group certification requirements in the group management system;	YES	PEFC EST 1002:2022 "5.1.2. The group entity shall provide a commitment to integrate the requirements of the group certification into the requirements of the group management system"
c) to continuously improve the group management system;	YES	PEFC EST 1002:2022 "5.1.3. (...) The group entity shall provide a commitment to continuously improve the group management system."
d) to continuously support the improvement of the sustainable management of the land/forests by the participants.	YES	PEFC EST 1002:2022 "5.2.1.1 The group entity shall o) provide a commitment to continuously support the organisation in improving sustainable forest management"
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 EST 1002:2022 "5.2.1.2 The commitment of the group entity shall be part of a group management policy and shall be publicly available as documented information upon request."

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
5.2.3 The standard requires that the participants shall provide a commitment		
a) to follow the rules of the management system;	YES	PEFC EST 1002:2022 "5.2.2.1. The organization shall a) implement the requirements of the (...) group management system and conclude a written agreement with the group entity on the requirements;"
b) to implement the requirements of the sustainability standard in their operations in their area.	YES	PEFC EST 1002:2022 "5.2.2.1. The organization shall a) implement the requirements of the forest certification scheme (...) and conclude a written agreement with the group entity on the requirements;"
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 EST 1002:2022 "5.1.4. If the group entity introduces changes in the group management system, the changes shall also be introduced in 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 EST 1002:2022 "6.4. The group management plan shall include the requirements of the PEFC Estonia Sustainable Forest Management Standard and other requirements of the forest certification scheme to be implemented on group level."
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 EST 1002:2022 "7.1 The group entity shall plan the means to establish, operate and improve the group management system." <i>It is insufficiently ensured that the resources needed shall not only be planned, but also be provided.</i>
7.2 The standard shall define the necessary competence of persons doing work in the group management system.	YES	PEFC EST 1002:2022 "7.2 Competence 7.2.1. The person responsible for managing the group shall have the following competence:

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>a) vocational or higher education in forestry or the environment; b) education can be equated with 3 years of experience in forestry.</p> <p>7.2.2. The person responsible for the management of the group shall have knowledge of sustainable forest management and shall keep himself/herself up-to-date through continuous training, including no less than participation in a training or instruction introducing the principles of sustainable forest management."</p>
7.3 The standard requires that communication processes shall be in place to raise the awareness of participants concerning:		
a) the group management policy;	YES	<p>PEFC EST 1002:2022</p> <p>"7.3.1. The internal communication of the group shall include no less than the following topics: a) management strategy of the group;"</p>
b) the requirements of the sustainable forest management standard;	YES	<p>PEFC EST 1002:2022</p> <p>"7.3.1. The internal communication of the group shall include no less than the following topics: b) the requirements of PEFC Estonia Sustainable Forest Management Standard"</p>
c) their contribution to the effectiveness of the group management system and the sustainable forest management, including the benefits of improved group performance;	YES	<p>PEFC EST 1002:2022</p> <p>"7.3.1. The internal communication of the group shall include no less than the following topics: g) their contribution to the effectiveness of the group management system and the sustainable forest management, including the benefits of improved group performance."</p>
d) the implications of not conforming with the group management system requirements.	YES	<p>PEFC EST 1002:2022</p> <p>c) the consequences of non-compliance with the group management system"</p>
7.4 The standard requires that the internal and external communications relevant to the group management system shall be determined. This includes:		
a) on what to communicate;	YES	<p>PEFC EST 1002:2022</p> <p>"7.3 The procedure for the internal and external communication of the group shall be determined including the following aspects: a) on what to communicate"</p>
b) when to communicate;	YES	<p>PEFC EST 1002:2022</p> <p>"b) when to communicate"</p>

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
c) with whom to communicate;	YES	PEFC EST 1002:2022 "d) with whom to communicate."
d) how to communicate.	YES	PEFC EST 1002:2022 "c) 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 EST 1002:2022 "7.4 The group shall have a policy for resolving complaints and disputes. Disputes and complaints shall be settled in accordance with these principles."
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 EST 1002:2022 "7.5 The documented information related to the implementation of the requirements of the group management system and forest certification scheme shall be: a) up to date and relevant"
b) available and suitable for use, where and when it is needed;	YES	PEFC EST 1002:2022 "b) available to relevant persons in justified cases"
c) adequately protected against loss of confidentiality, improper use, or loss of integrity.	YES	PEFC EST 1002:2022 "c) protected against the breach of confidentiality clauses and improper use"
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 EST 1002:2022 "8.1 The group entity shall plan, implement and control necessary processes needed: a) to meet the requirements of the forest certification scheme"
b) to implement the actions determined in 6.	YES	PEFC EST 1002:2022 "b) to implement the actions specified in clauses 6 and 5.1.4."
8.2 The standard requires that this planning, implementing and controlling shall be done by:		

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
a) defining the necessary processes and establishing criteria for those;	YES	PEFC EST 1002:2022 "8.2 According to the requirements of the standard the planning, implementing and controlling shall be carried out by a) defining the necessary processes and establishing criteria for the implementation thereof"
b) implementing control of the processes in accordance with the criteria;	YES	PEFC EST 1002:2022 "b) implementing control of the processes in accordance with the criteria"
c) keeping documented information to the extent necessary to have confidence that the processes have been carried out as planned.	YES	PEFC EST 1002:2022 "c) keeping documented information to the extent necessary to have confidence that the processes have been carried out as planned."
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 EST 1002:2022 "8.2. According to the requirements of the standard the planning, implementing and controlling shall be carried out by a) defining the necessary processes and establishing criteria for the implementation thereof. It shall be determined, among other things, what shall be monitored and measured"
b) the methods for monitoring, measurement, analysis and evaluation, as applicable, to ensure valid results;	YES	PEFC EST 1002:2022 "8.2. According to the requirements of the standard the planning, implementing and controlling shall be carried out by a) defining the necessary processes and establishing criteria for the implementation thereof. It shall be determined, among other things, (...) the methods for monitoring, measurement, analysis and evaluation, as applicable, to ensure valid results;"
c) when the monitoring and measuring shall be performed;	YES	PEFC EST 1002:2022 "8.2. According to the requirements of the standard the planning, implementing and controlling shall be carried out by

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		a) defining the necessary processes and establishing criteria for the implementation thereof. It shall be determined, among other things, (...) when the monitoring and measuring shall be performed”
d) when the results from monitoring and measurement shall be analysed and evaluated;	YES	PEFC EST 1002:2022 “8.2. According to the requirements of the standard the planning, implementing and controlling shall be carried out by a) defining the necessary processes and establishing criteria for the implementation thereof. It shall be determined, among other things, (...) when the results from monitoring and measurement shall be analysed and evaluated”
e) what documented information shall be available as evidence of the results.	YES	PEFC EST 1002:2022 “8.2. According to the requirements of the standard the planning, implementing and controlling shall be carried out by c) keeping documented information to the extent necessary to have confidence that the processes have been carried out as planned.”
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 EST 1002:2022 “8.3. 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.”
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 EST 1002:2022 “9.6. The group management system internal audit shall be implemented according to clause 9.2 in terms of the following activities: a) the conformity of the group entity to the requirements of the forest certification scheme e) the compliance of the group’s management system with the requirements of the management system established by the group entity.”

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
b) ensures the implementation of the sustainable forest management standard on the participant level;	YES	PEFC EST 1002:2022 “ 9.1. An internal auditing programme shall provide confidence that the (...) the organization are in conformity with the requirements of the sustainable forest management scheme.”
c) is effectively implemented and maintained.	YES	PEFC EST 1002:2022 “9.1.2. An annual internal audit programme shall provide information on whether the group management system is effectively implemented and maintained. 9.6. The group management system internal audit shall be implemented according to clause 9.2 in terms of the following activities: b) the timely implementation of the forest management internal audit(s); 9.7.1. An annual review of group management system shall at least include: a) the status of actions from previous management system reviews; b) changes in external and internal issues that are relevant to the group management system; c) the status of conformity with the requirements of the forest certification scheme that includes reviewing the results of the internal monitoring programme, the internal audits and certification audit; d) information on the group performance, including trends in: i. results of the certification audit; ii. results of internal monitoring and internal audit(s); iii. nonconformities and corrective actions; e) opportunities for continual improvement. 9.7.2. The standard requires that the outputs of the management system review shall include decisions related to continual improvement opportunities and any need for changes to the group management system.”
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 EST 1002:2022 “9.1.1. 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.”
9.2.2 Organisation		
The standard requires an internal audit programme which shall cover at least:		

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
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 EST 1002:2022 "9.2. The group has determined the principles of carrying out the internal audit programme, in particular a) the planning, establishing, implementing and maintaining an internal audit programme(s) including the frequency, methods, responsibilities, planning requirements and reporting of the internal audit, which shall take into consideration the importance of the processes concerned and the results of previous internal audits"
b) definition of the audit criteria and scope for each audit;	YES	PEFC EST 1002:2022 "b) the definition of the internal audit criteria and scope for each internal audit"
c) competence of internal auditor (forest knowledge, standard knowledge);	YES	PEFC EST 1002:2022 "c) requirements for the competence of an internal auditor (forest knowledge, standard knowledge, certification and auditing knowledge)"
d) selection of auditors and conducting of audits to ensure objectivity and the impartiality of the audit process;	YES	PEFC EST 1002:2022 "d) the procedure for the selection of internal auditors and conducting of internal audits to ensure the objectivity and impartiality of the internal audit process"
e) ensuring that the results of the audits are reported to relevant group management;	YES	PEFC EST 1002:2022 "e) the procedure for ensuring that the results of the internal audits are reported to relevant group management"
f) retaining of the documented information as evidence of the implementation of the audit programme and the audit results.	YES	PEFC EST 1002:2022 "f) the procedure for retaining the documented information as evidence of the implementation of the internal audit programme and the internal audit 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 EST 1002:2022

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		"9.5.2.1. The group entity shall establish the principles for the selection of organizations in the forest management internal audit programme. These requirements shall include the following procedures for a) determination of the sample size"
b) determination of sample categories(9.3.3);	YES	PEFC EST 1002:2022 "b) determination of sample categories"
c) distribution of the sample to the categories (9.3.4);	YES	PEFC EST 1002:2022 "c) distribution of the sample to the categories"
d) selection of the participants (9.3.5).	YES	PEFC EST 1002:2022 "d) selection of the organizations."
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.</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 EST 1002:2022 "9.5.2.5. The group entity shall determine the sample for the entire group, including participants from all subgroups. The group entity shall give the lists and other necessary documents to the subgroup entity to conduct an internal audit in the region where the participant belongs to. The subgroup entity forwards the internal audit results to the group entity."
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 EST 1002:2022 "9.5.2.2.1. The sample size shall be calculated for the organizations of the group."
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 EST 1002:2022 "9.5.2.2.2. The size of the sample shall be the square root of the number of organisations: $(y=\sqrt{x})$, rounded to the upper 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:		

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)																																
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;	NO	<p>PEFC EST 1002:2022</p> <p>“9.5.2.2.3. The size of the sample may be adapted taking into account one or more of the indicators from the Table 1.</p> <p>Table 1. Matrix for assessment of risk used for determination of sample categories for internal audit of group participants</p> <table><tr><th>Risk</th><th>Indicator for risk</th><th>Score</th></tr><tr><td rowspan="3">Forest area</td><td>Forest area < 500 ha</td><td>1 [Low]</td></tr><tr><td>Forest area 500 ha – 5 000 ha</td><td>3 [Medium]</td></tr><tr><td>Forest area > 5 000 ha</td><td>5 [High]</td></tr><tr><td rowspan="3">Forest management work</td><td>Organisation carried out forest management work more than 3 calendar years ago</td><td>1 [Low]</td></tr><tr><td>Organisation carried out forest management work within previous 2-3 calendar years</td><td>3 [Medium]</td></tr><tr><td>Organisation carried out forest management work within last calendar year</td><td>5 [High]</td></tr><tr><td rowspan="3">Results of internal audits and/or previous certification audits</td><td>Nonconformities and deficiencies have not been identified</td><td>1 [Low]</td></tr><tr><td>Up to 5 minor nonconformities have been identified</td><td>3 [Medium]</td></tr><tr><td>Over 5 minor nonconformities and/or a major nonconformity/some major nonconformities have been identified.</td><td>5 [High]</td></tr></table> <p>Table 2. Risk rankings</p> <table><tr><th>Risk ranking</th><th>Score (from Table 1.)</th></tr><tr><td>Low</td><td>Up to 5</td></tr><tr><td>Medium</td><td>From 6 to 9</td></tr><tr><td>High</td><td>From 10 to 15</td></tr></table> <p>Table 1 and 2 provide the indicators and their risk ranking to identify the risk score per risk category. However, the implications of the risk assessment on the sample size are not further defined, as the standard does not define the deviations of sample sizes in case of low or high risk for individual categories. It shall be noted such deviations shall be established in the standard.</p>	Risk	Indicator for risk	Score	Forest area	Forest area < 500 ha	1 [Low]	Forest area 500 ha – 5 000 ha	3 [Medium]	Forest area > 5 000 ha	5 [High]	Forest management work	Organisation carried out forest management work more than 3 calendar years ago	1 [Low]	Organisation carried out forest management work within previous 2-3 calendar years	3 [Medium]	Organisation carried out forest management work within last calendar year	5 [High]	Results of internal audits and/or previous certification audits	Nonconformities and deficiencies have not been identified	1 [Low]	Up to 5 minor nonconformities have been identified	3 [Medium]	Over 5 minor nonconformities and/or a major nonconformity/some major nonconformities have been identified.	5 [High]	Risk ranking	Score (from Table 1.)	Low	Up to 5	Medium	From 6 to 9	High	From 10 to 15
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c) quality / level of confidence of the internal monitoring programme;	N.A.	PEFC EST 1002:2022 does not include the option to adapt the sample size based on the quality / level of confidence of the internal monitoring programme.																		
d) use of technologies allowing the gathering of information concerning specified requirements; Note: Such technologies may be e.g. the use of satellite data or drones and allow compliance statements for specific requirements of a sustainability standard or support the risk based sampling.	N.A.	PEFC EST 1002:2022 does not include the option to adapt the sample size based on the use of technologies allowing the gathering of information concerning specified requirements.																		
e) based on other means of gathering information about activities on the ground.	N.A.	PEFC EST 1002:2022 does not include the option to adapt the sample size based on other means of gathering information about activities on the ground.																		

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)																		
Note: One way could be a survey with participants who provide some information about their activities on the ground.																				
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);	N.A.	Not included as an option in PEFC EST 1002.																		
b) size of management units (different size classes);	YES	<p>PEFC EST 1002:2022</p> <p>“9.5.2.2.3. The size of the sample may be adapted taking into account one or more of the indicators from the Table 1.</p> <p>Table 1. Matrix for assessment of risk used for determination of sample categories for internal audit of group participants</p> <table><tr><th>Risk</th><th>Indicator for risk</th><th>Score</th></tr><tr><td rowspan="3">Forest area</td><td>Forest area < 500 ha</td><td>1 [Low]</td></tr><tr><td>Forest area 500 ha – 5 000 ha</td><td>3 [Medium]</td></tr><tr><td>Forest area > 5 000 ha</td><td>5 [High]</td></tr></table> <p>Table 2. Risk rankings</p> <table><tr><th>Risk ranking</th><th>Score (from Table 1.)</th></tr><tr><td>Low</td><td>Up to 5</td></tr><tr><td>Medium</td><td>From 6 to 9</td></tr><tr><td>High</td><td>From 10 to 15</td></tr></table> <p>“</p>	Risk	Indicator for risk	Score	Forest area	Forest area < 500 ha	1 [Low]	Forest area 500 ha – 5 000 ha	3 [Medium]	Forest area > 5 000 ha	5 [High]	Risk ranking	Score (from Table 1.)	Low	Up to 5	Medium	From 6 to 9	High	From 10 to 15
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c) biogeographic region (e.g. lowlands, low mountain range, high mountain range);	N.A.	Not included as an option in PEFC EST 1002, as (according to EFCC) such distinctions are not relevant in Estonia.																		
d) operations, processes and products of potential group participants;	YES	<p>PEFC EST 1002:2022</p> <p>“9.5.2.2.3. The size of the sample may be adapted taking into account one or more of the indicators from the Table 1.</p>																		

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Forest management work	Organisation carried out forest management work more than 3 calendar years ago	1 [Low]																		
	Organisation carried out forest management work within previous 2-3 calendar years	3 [Medium]																		
	Organisation carried out forest management work within last calendar year	5 [High]																		
Risk ranking	Score (from Table 1.)																			
Low	Up to 5																			
Medium	From 6 to 9																			
High	From 10 to 15																			
e) deforestation and forest conversion;	N.A.	<i>Not included as an option in PEFC EST 1002.</i>																		
f) rotation period(s);	N.A.	<i>Not included as an option in PEFC EST 1002.</i>																		
g) richness of biological diversity;	N.A.	<i>Not included as an option in PEFC EST 1002.</i>																		
h) recreation and other socio-economic functions of the forest;	N.A.	<i>Not included as an option in PEFC EST 1002.</i>																		
i) dependence of and interaction with local communities and indigenous people;	N.A.	<i>Not included as an option in PEFC EST 1002. It shall be noted there are no indigenous people in Estonia.</i>																		
j) available resources for administration, operations, training and research;	N.A.	<i>Not included as an option in PEFC EST 1002.</i>																		
k) governance and law enforcement.	N.A.	<i>Not included as an option in PEFC EST 1002.</i>																		
9.3.3.2 Conditions which constitute risk for each indicator on low, medium and high level and the	NO	PEFC EST 1002:2022 “9.5.2.2.3. (...) Table 1. Matrix for assessment of risk used for determination of sample categories for internal audit of group participants																		

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)		
respective consequences for the sampling shall be defined.		Risk	Indicator for risk	Score
		Forest area	Forest area < 500 ha	1 [Low]
			Forest area 500 ha – 5 000 ha	3 [Medium]
			Forest area > 5 000 ha	5 [High]
		Forest management work	Organisation carried out forest management work more than 3 calendar years ago	1 [Low]
			Organisation carried out forest management work within previous 2-3 calendar years	3 [Medium]
			Organisation carried out forest management work within last calendar year	5 [High]
		Results of internal audits and/or previous certification audits	Nonconformities and deficiencies have not been identified	1 [Low]
			Up to 5 minor nonconformities have been identified	3 [Medium]
			Over 5 minor nonconformities and/or a major nonconformity/some major nonconformities have been identified.	5 [High]
		Table 2. Risk rankings		
		Risk ranking	Score (from Table 1.)	
		Low	Up to 5	
Medium	From 6 to 9			
High	From 10 to 15			
Table 1 and 2 provide the indicators and their risk ranking to identify the risk score per risk category. However, the standard does not define the respective consequences for the sampling per category.				
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 EST 1002:2022 “9.5.2.3.1. Sample categories shall be established based on the results of using the sum of indicators in Table 1 and the risk ranking of Table 2.”		
9.3.5 Selection of the participants				
9.3.5.1 At least 25% of the sample should be selected at random.	YES	PEFC EST 1002:2022 “9.5.2.4.1. At least 25% of the sample shall be selected at random.”		
9.3.5.2 A risk-based procedure for the selection of the participants shall be specified.	YES	PEFC EST 1002:2022 “9.5.2.4.2. A risk-based procedure for the selection of the participants shall be specified.”		

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
9.4 Management review		
9.4.1 The standard requires that an annual management review shall at least include:		
a) the status of actions from previous management reviews;	YES	PEFC EST 1002:2022 "9.7.1. An annual review of group management system shall at least include: a) the status of actions from previous management system reviews"
b) changes in external and internal issues that are relevant to the group management system;	YES	PEFC EST 1002:2022 "b) changes in external and internal issues that are relevant to the group management system"
c) the status of conformity with the sustainable forest management standard, that includes reviewing the results of the internal monitoring programme, the internal audit and the certification body's evaluations and surveillance;	YES	PEFC EST 1002:2022 "9.7.1. An annual review of group management system shall at least include: c) the status of conformity with the requirements of the forest certification scheme that includes reviewing the results of the internal monitoring programme, the internal audits and certification audit"
d) information on the group performance, including trends in: i. nonconformities and corrective actions; ii. monitoring and measurement results; iii. audit results;	YES	PEFC EST 1002:2022 "9.7.1. An annual review of group management system shall at least include: d) information on the group performance, including trends in: i. results of the certification audit; ii. results of internal monitoring and internal audit(s); iii. nonconformities and corrective actions"
e) opportunities for continual improvement.	YES	PEFC EST 1002:2022 "e) opportunities for continual 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 EST 1002:2022 "9.7.2. The standard requires that the outputs of the management system review shall include decisions related to continual improvement opportunities and any need for 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 EST 1002:2022 "9.7.3. The group entity shall retain documented information as the evidence of the results of management system reviews."

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
10. Improvement		
10.1 Non conformity and corrective action		
10.1.1 The standard requires when a nonconformity occurs, the group organisation shall:		
a) react to the nonconformity and, as applicable: i. take action to control and correct it; ii. deal with the consequences;	YES	PEFC EST 1002:2022 “10.1.1 When a nonconformity is identified in the course of certification audit the group entity shall: a) react to the nonconformity and, as applicable: i. take action 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 EST 1002:2022 “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”
c) implement any action needed;	YES	PEFC EST 1002:2022 “c) implement any corrective action needed”
d) review the effectiveness of any corrective action taken;	YES	PEFC EST 1002:2022 “d) review the effectiveness of any corrective action taken”
e) make changes to the group management system, if necessary.	YES	PEFC EST 1002:2022 “e) make changes to the group management system, if necessary”
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 EST 1002:2022 “10.1.2 The group entity shall retain up to date and relevant documented information as evidence of: a) the nature of the nonconformities and any subsequent actions taken”
b) the results of any corrective action.	YES	PEFC EST 1002:2022



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		"b) the results of any corrective action"
10.1.3 The standard requires that a participant who was excluded from a group certification shall be internally audited by the group entity before it is allowed to re-enter the group certification. The internal audit shall not take place sooner than 12 months after the exclusion.	YES	PEFC EST 1002:2022 "10.1.3 An organization having been excluded from a group certification shall be internally audited by the group entity before it is allowed to re-enter the group certification. The internal audit shall not take place sooner than 12 months after the exclusion from the group."
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 EST 1002:2022 "10.2 Continual improvement 10.2.1 The group entity shall continuously improve the suitability, adequacy and effectiveness of the group management system and sustainable forest management."



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)
4. 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 EST 1003:2022 “4.1 General principles of the PEFC standard 4.1.1. The requirements of the PEFC standard apply to all activities in the certified area affecting the organisation's compliance with PEFC requirements. 4.1.2. The organization may participate in certification through an authorized person, but the organization shall be aware of the responsibilities associated with certification. 4.1.3. The PEFC certificate covers all forest land owned and/or held by the organization consisting of a) forest land subject to the application of the Forest Act and where partial certification is not permitted; b) areas covered by trees and/or shrubs complying with the requirements of the structure of forest land which, however, cannot be classified as forest land pursuant to the Forest Act (eg: plantations, shrubs, wooded meadows, wooded bogs, parks, arboretums, permanent grasslands with wooded plants etc).” <i>The clauses of PEFC EST 1003 furthermore include management and performance requirements that are applicable at the forest management unit level</i>
b) be clear, performance based and auditable;	YES	<i>The clauses of PEFC EST 1003 are clear, performance based and auditable.</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	PEFC EST 1003:2022 “4.1.1. The requirements of the PEFC standard apply to all activities in the certified area affecting the organisation's compliance with PEFC requirements. 4.1.3. The PEFC certificate covers all forest land owned and/or held by the organization consisting of a) forest land subject to the application of the Forest Act and where partial certification is not permitted;



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		b) areas covered by trees and/or shrubs complying with the requirements of the structure of forest land which, however, cannot be classified as forest land pursuant to the Forest Act (eg: plantations, shrubs, wooded meadows, wooded bogs, parks, arboretums, permanent grasslands with wooded plants etc)."
d) require record-keeping that provides evidence of compliance with the requirements of the forest management standards;	YES	PEFC EST 1003:2022 "4.1.8. The organization shall keep records of its activities in a manner that provides evidence of compliance with the requirements of the PEFC standard."
e) specify "100% PEFC certified", or another system specific claim, as claim to be used to communicate the origin of products in an area covered by the standard to customers with a PEFC chain of custody; Note: System specific claims of PEFC endorsed standards and PEFC Council approved abbreviations of such claims and the claim "100% PEFC certified", and their translations into languages other than English, are published online on the PEFC website www.pefc.org .	YES	PEFC EST 1003:2022 "Introduction (...) Certification – demonstrating compliance with standard requirements (...) When compliance is assured, the certification body shall issue a certificate valid up to five years and the organization shall earn the right to make "PEFC certified" claims and use the PEFC label. 4.1.9. PEFC claims on the products about originating from a certified area can only be made by organizations covered by a PEFC certificate. 4.1.10. The organization has the right to make a PEFC claim on wood, non-wood forest products and key ecosystem services to inform consumers and customers with a PEFC chain of custody certificate that the product originates from a certified area. 4.1.11. The PEFC claim can only be made with regard to roundwood, wood chips, energy wood and non-wood forest products, as well as other key ecosystem services originating from the certified area."
f) require that where owners/managers of forests are selling products from areas other than covered by the standard, only products from areas covered by the standard are sold with the claim "100% PEFC-certified" or a system specific claim;	YES	PEFC EST 1003:2022 "4.1.11. The PEFC claim can only be made with regard to roundwood, wood chips, energy wood and non-wood forest products, as well as other key ecosystem services originating from the certified area."
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	PEFC EST 1003:2022 "Introduction (...) Certification – demonstrating compliance with standard requirements (...) When compliance is assured, the certification body shall issue a certificate valid up to five years and the organization shall earn the right to make "PEFC certified" claims and use the PEFC label. 4.1.9. PEFC claims on the products about originating from a certified area can only be made by organizations covered by a PEFC certificate."

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
h) specify requirements concerning the information which need to be provided to a PEFC chain of custody certified customer;	YES	<p>PEFC EST 1003:2022</p> <p>"7.5.2 When supplying wood the organization shall provide no less than the following information to the customers holding a PEFC chain of custody certificate:</p> <p>(a) the identification of the cadastral unit indicating the origin of the wood and, in the case of the state forest, the number of the quarter and forest allocation;</p> <p>(b) the name of the assortment;</p> <p>(c) the quantity of the assortment;</p> <p>(d) tree species or a group of tree species;</p> <p>e) PEFC certificate number;</p> <p>(f) the applicable PEFC claim;</p> <p>(g) the name of the organization;</p> <p>(h) date of delivery.</p> <p>Note: tree species (eg silver birch, dwarf birch, black alder, grey alder, aspen, hybrid aspen, larch species) may be reported as groups of tree species (eg birch, aspen, alder, larch, etc). It is not required to identify shrub species. Also, in case of firewood, energy wood and woodchips the tree species group "coniferous" or "deciduous" may be used if the species are mixed."</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 EST 1003:2022</p> <p>"1. Scope (...) Annex 2 lists the applicable legislation.</p> <p>Annex 2. List of applicable legislation"</p> <p><i>Annex 2 includes a long list of applicable legislation, including aspects not covered by the standard.</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 EST 1003:2022</p> <p>"6.2.1. The organization shall identify the stakeholders affected by forest management activities"</p>
b) the relevant needs and expectations of these stakeholders.	YES	<p>PEFC EST 1003:2022</p> <p>"6.2.1. The organization shall identify (...) their potential needs and expectations."</p>

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
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 EST 1003:2022 “5.3.1. The management system shall include the principles for planning, organizing, carrying out, monitoring and evaluating the results of the forest management work and the assessment of the environmental, social, and economic impacts of the forest management work. 5.3.3. The organization shall establish principles for a management system and designate a person(s) responsible for the implementation of the requirements of the PEFC standard.”
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 EST 1003:2022 “5.3.1. The management system shall include the principles for planning, organizing, carrying out, monitoring and evaluating the results of the forest management work and the assessment of the environmental, social, and economic impacts of the forest management work. 9.1.1. The organization shall periodically evaluate the change in forest resources, the quality of the forest management work and its impact on forest and key ecosystem services, and correct its activities, if necessary. The organization shall also assess the environmental, social and economic impact of the forest management work.”
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 EST 1003:2022 “5. Management 5.1. The organization shall provide a commitment to comply with the PEFC standard and other applicable PEFC requirements.”
b) to continuously improve the sustainable forest management system.	YES	PEFC EST 1003:2022 “5.3.2. The organization shall systematically improve the management system in accordance with the requirements of sustainable forest management.”
5.2 The standard requires that this commitment shall be publicly available.	YES	PEFC EST 1003:2022 “5.2. The organization shall confirm the compliance with the requirements of the PEFC standard and the confirmation shall be made available to the public on the website of the organization or EFCC or in another publicly available register/database.”



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
5.3 The standard requires that responsibilities for sustainable forest management shall be clearly defined and assigned.	YES	PEFC EST 1003:2022 "5.3.3. The organization shall establish principles for a management system and designate a person(s) responsible for the implementation of the requirements of the PEFC standard."
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	PEFC EST 1003:2022 "6.1. Actions to address risks and opportunities 6.1.1. The organization shall consider risks and opportunities concerning the compliance with the requirements of the PEFC standard. The assessment of risks and opportunities shall be up-to-date and relevant and the size of the organisation and the scale of operations shall be considered."
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	PEFC EST 1003:2022 "6.3. Management plan 6.3.2. The organization shall have an up-to-date and relevant overview of its forest. Indicators: the organization has the inventory and mapping of the forest performed in accordance with the legislation and established planning. The organization has policies in place to ensure up-to-date and relevant forest inventory data. 6.3.4. The management plan shall include no less than b) the purpose of the land parcels; c) the intended use of the land parcels; d) a summary of the description of the forest (including area distribution of land use, areas of stand development classes by main tree species, area and/or proportion of ecologically valuable forest and ecologically valuable nonforest land), presence of the forest with the function of significant environmental protection, forest with the function of balancing the environment and forest of cultural value; f) the average annual felling area and/or volume."
6.2 Management plan		
6.2.1 The standard requires that management plans shall be:		



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
a) elaborated and periodically updated or continually adjusted;	YES	<p>PEFC EST 1003:2022</p> <p>“6.3. Management plan</p> <p>6.3.1. The management plan shall be based on applicable local, national and international legislation as well as existing land-use or other official land use plans.</p> <p>6.3.2. The organization shall have an up-to-date and relevant overview of its forest.</p> <p>Indicators: the organization has the inventory and mapping of the forest performed in accordance with the legislation and established planning. The organization has policies in place to ensure up-to-date and relevant forest inventory data.</p> <p>6.3.3. The organization shall have established management policies that reduce the risks of damage to and deterioration of the ecosystem and policies that support the ensuring of the good condition of the ecosystem.</p> <p>8.2.1. The good status of the ecosystem shall be maintained or enhanced, if necessary in the forest by making the best use of the forest structure and natural processes. A damaged or gradually impoverished ecosystem with reduced ecological integrity (degraded ecosystem) shall be restored wherever and as far as economically feasible or left to natural development (succession).</p> <p>Note: In case of plantations the requirement has to be met at least in buffer strips and set-aside areas of plantations.</p> <p>Indicators: the condition of the forest has been described in the forest register, forest management plan or other records and the long-term objectives of forest management have been described in the management plan. Degraded areas have been mapped, the feasibility of the restoration has been determined and appropriate techniques have been applied according to the long-term plan in the areas designated for restoration.</p> <p>9.1.1. The organization shall periodically evaluate the change in forest resources, the quality of the forest management work and its impact on forest and key ecosystem services, and correct its activities, if necessary. The organization shall also assess the environmental, social and economic impact of the forest management work.</p> <p>Indicators: the quality of forest management work and various impacts have been evaluated. The results of the evaluation have been taken into account. The results of the evaluation have been taken into account in the planning and implementing of forest management work and the results of evaluation have been added to the management plan.”</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
b) appropriate to the size and use of the forest area;	YES	<p>PEFC EST 1003:2022</p> <p>“6.3.2. (...) the organization has the inventory and mapping of the forest performed in accordance with the legislation and established planning.</p> <p>6.3.4. The management plan shall include no less than</p> <p>b) the purpose of the land parcels;</p> <p>c) the intended use of the land parcels;</p> <p>d) a summary of the description of the forest (including area distribution of land use, areas of stand development classes by main tree species, area and/or proportion of ecologically valuable forest and ecologically valuable non-forest land), presence of the forest with the function of significant environmental protection, forest with the function of balancing the environment and forest of cultural value;</p> <p>e) long-term goals for sustainable forest management;</p> <p>f) the average annual felling area and/or volume, including the justification thereof.</p> <p>8.2.1. The good status of the ecosystem shall be maintained or enhanced, if necessary in the forest by making the best use of the forest structure and natural pro-cesses. A damaged or gradually impoverished ecosystem with reduced ecological integrity (degraded ecosystem) shall be restored wherever and as far as eco-nomically feasible or left to natural development (succession). (...) Indicators: the condition of the forest has been described in the forest register, forest management plan or other records and the long-term objectives of forest management have been described in the management plan.</p> <p>8.5.2. The organization shall have an overview of significant forests with the function of environmental protection and forests with the function of balancing the environment, and the management of these forests shall ensure the long-term preservation of these functions.</p> <p>9.1.1. The organization shall periodically evaluate the change in forest resources, the quality of the forest management work and its impact on forest and key ecosystem services, and correct its activities, if necessary.”</p>
c) based on applicable local, national and international legislation as well as existing land-use or other official plans; and	YES	<p>PEFC EST 1003:2022</p> <p>“6.3.1. The management plan shall be based on applicable local, national and international legislation as well as existing land-use or other official land use plans.”</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
d) adequately covering forest resources.	YES	<p>PEFC EST 1003:2022</p> <p>“6.3.2. The organization shall have an up-to-date and relevant overview of its forest.</p> <p>6.3.4. The management plan shall include no less than</p> <p>d) a summary of the description of the forest (including area distribution of land use, areas of stand development classes by main tree species, area and/or proportion of ecologically valuable forest and ecologically valuable non-forest land), presence of the forest with the function of significant environmental protection, forest with the function of balancing the environment and forest of cultural value;”</p>
6.2.2 The standard requires that management plans shall take into account the different uses or functions of the managed forest area.	YES	<p>PEFC EST 1003:2022</p> <p>“6.3.4. The management plan shall include no less than</p> <p>b) the purpose of the land parcels;</p> <p>c) the intended use of the land parcels</p> <p>d) a summary of the description of the forest (including area distribution of land use, (...) area and/or proportion of ecologically valuable forest and ecologically valuable nonforest land), presence of the forest with the function of significant environmental protection, forest with the function of balancing the environment and forest of cultural value;”</p>
6.2.3 The standard requires that management plans shall include at least a description of the current forest management unit, long-term objectives, and the average annual allowable cut, including its justification.	YES	<p>PEFC EST 1003:2022</p> <p>“6.3.2. The organization shall have an up-to-date and relevant overview of its forest.</p> <p>Indicators: the organization has the inventory and mapping of the forest performed in accordance with the legislation and established planning. The organization has policies in place to ensure up-to-date and relevant forest inventory data.</p> <p>6.3.4. The management plan shall include no less than</p> <p>d) a summary of the description of the forest (including area distribution of land use, areas of stand development classes by main tree species, area and/or proportion of ecologically valuable forest and ecologically valuable non-forest land), presence of the forest with the function of significant environmental protection, forest with the function of balancing the environment and forest of cultural value</p> <p>e) long-term goals for sustainable forest management;</p> <p>f) the average annual felling area and/or volume, including the justification thereof.”</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
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 EST 1003:2022 “6.3.5. In case the management plan covers the commercial use of non-wood forest products and other key ecosystem services by the organization, the organization shall include the annually allowable use and/or area of commercial non-wood forest products and other key ecosystem services ensuring their long-term sustainability. Indicators: the organization has developed principles for assessing the sustainability of commercial use of non-wood forest products and other key ecosystem services. The organization has provided data on sustainable annual allowable use and/or area of the products.”
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 EST 1003:2022 “6.3.3. The organization shall have established management policies that reduce the risks of damage to and deterioration of the ecosystem and policies that support the ensuring of the good condition of the ecosystem.”
6.2.6 The standard requires that management plans shall take into account the results of scientific research.	YES	PEFC EST 1003:2022 “6.3.6. Science-based approach is used in forest management work and forest management is built on good practice.”
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 EST 1003:2022 “6.3.7. The organization shall make the summary of the management plan publicly available. The management plan shall include no less than b) long-term forest management objectives and a summary of forest management principles of the organization; c) a summary of the previous PEFC audit.”
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 EST 1003:2022 “6.3.7. (...) Note: confidential information, the disclosure of which is restricted by law (eg nature protection restrictions, personal data) and confidential information in the audit report shall be excluded from the summary of the management plan.
6.3 Compliance requirements		

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
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 EST 1003:2022</p> <p>“1. Scope (...) Annex 2 lists the applicable legislation.</p> <p>6.4.1.1 The activities of the organization shall comply with legal acts.</p> <p>7.2.1. The organization shall ensure that forest management work is carried out by competent persons.</p> <p>7.2.2. Persons performing forest management work for the organization shall have knowledge of sustainable forest management and shall keep themselves up-to-date through continuous training, including no less than participation in a training or instruction introducing the principles of sustainable forest management. The organization shall provide persons carrying out forest management work with necessary information and ensure trainings on sustainable forest management.</p> <p>Indicators: The organization has provided necessary information on sustainable forest management. Persons performing forest management work have a document providing evidence on knowledge of sustainable forest management (eg a training certificate or a proof of instruction) and/or a corresponding requirement has been included in service contracts. The organization has provided employees with necessary information on relevant legal acts.</p> <p>Annex 2. List of applicable legislation”</p> <p><i>Annex 2 includes a long list of applicable legislation. Although clauses 7.2.1 and 7.2.2 require competent persons, and organisations shall provide employees with necessary information on relevant legal acts, it is insufficiently ensured organisations shall determine how the compliance obligations apply to the organisation.</i></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 EST 1003:2022</p> <p>“1. Scope (...) Annex 2 lists the applicable legislation.</p> <p>6.4.1.1 The activities of the organization shall comply with legal acts.</p> <p>Annex 2. List of applicable legislation</p> <ul style="list-style-type: none"> • Forest Act <p>Forest management rules</p> <ul style="list-style-type: none"> • Forest management guide (...) • Requirements for the technical equipment of the forest management work



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<ul style="list-style-type: none"> • A guide to the methodology for forest assessment (...) • Nature Conservation Act • Hunting Act • Heritage Protection Act • Land Improvement Act • Earth's Crust Act • Water Act • General Part of the Environmental Code Act • Occupational Health and Safety Act • Employment Contracts Act • Law of Property Act • Law of Property Act Implementation Act Income Tax Act • Value-Added Tax Act • Land Register Act • Restrictions on Acquisition of Immovables Act • Land Cadastre Act • Land Tax Act • Taxation Act • Plant Protection Act • Fire Safety Act • Accounting Act • Anti-corruption Act • Social Tax Act • Trade Unions Act • Community-scale Involvement of Employees Act • Collective Agreements Act"

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	PEFC EST 1003:2022 "1. Scope (...) Annex 2 lists the applicable legislation. 6.4.1.1 The activities of the organization shall comply with legal acts. Annex 2. List of applicable legislation • Anti-corruption Act"
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 EST 1003:2022 "6.4.1.2. The organization shall take measures to prevent illegal activities in the forest."
6.3.2 Legal, customary and traditional rights related to the forest land		
6.3.2.1 The standard requires that property rights, tree ownership and land tenure arrangements shall be clearly defined, documented and established for the relevant management unit. Likewise, legal, customary and traditional rights related to the forest land shall be clarified, recognised and respected. Note: Guidance for the handling of tenure arrangements can be obtained from the FAO Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security.	YES	PEFC EST 1003:2022 "6.4.2.1 The ownership or possession of each property of the organization shall be unequivocally proved."
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	N.A.	Explanation provided by EFCC "Estonia has not ratified ILO 169 and the UN Declaration on the Rights of Indigenous Peoples" <i>It shall be noted there are no groups in Estonia considered indigenous people.</i>

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
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.		
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 EST 1003:2022 "2. International Normative Documents United Nations Universal Declaration of Human Rights, 1948 6.4 Compliance requirements 6.4.1 Legal compliance 6.4.1.1 The activities of the organization shall comply with legal acts."
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 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.	YES	PEFC EST 1003:2022 "1. Scope (...) Annex 2 lists the applicable legislation. 6.4.1.1 The activities of the organization shall comply with legal acts." <i>Estonia ratified all fundamental conventions.</i>
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	YES	PEFC EST 1003:2022 "6.4.3.1 Occupational safety requirements shall be met and appropriate personal protective equipment shall be used when performing forest management work.

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
workers from work-related risks. Workers shall be informed about the risks involved with their work and about preventive measures.		6.4.3.2 Employees of the organization shall be informed of the risks associated with their work and measures shall be taken to prevent the risks. Indicators: the results of the risk analysis have been communicated to employees. Safety instructions have been laid down and carried out."
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 EST 1003:2022 "6.4.3.1 Occupational safety requirements shall be met and appropriate personal protective equipment shall be used when performing forest management work. 6.4.3.2 Employees of the organization shall be informed of the risks associated with their work and measures shall be taken to prevent the risks Indicators: (...) Safety instructions have been laid down and carried out. 6.4.3.3 The working and rest time of the employees of the organization shall comply with legal acts or collective agreements."
6.3.4.3 The standard requires that wages of local and migrant forest workers as well as of contractors and other operators operating in PEFC-certified areas shall meet or exceed at least legal, industry minimum standards or, where applicable, collective bargaining agreements. Note: Where wages are below the living wage of a country, steps should be taken to attain increased wages towards a living wage level over time in addition to increases for inflation.	YES	PEFC EST 1003:2022 "6.4.3.4 The employees of the organization shall receive a fair wage. Temporary agency workers may be employed only if the organization can demonstrate that the rights of the temporary agency workers are guaranteed. Note: people with similar responsibilities, including temporary staff, receive equal pay in the organization. Indicators: employees of the organization and natural persons providing services to the organization are registered in the Register of Employees (TÖR). In case of the use of employees performing duties by way of temporary agency work, temporary employment contracts have been concluded and the temporary staff is treated in the same way as the staff of the organization. Employment contracts have been concluded. The employees of the organization are paid at least the minimum wage."
6.3.4.4 The standard requires that the organisation is committed to equal opportunities, non-discrimination and freedom from workplace harassment. Gender equality shall be promoted.	YES	PEFC EST 1003:2022 "6.4.3.5 The organization shall create a working environment where discrimination and unfair treatment of employees shall be avoided and equal opportunities for employees shall be ensured."
7. Support		

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
7.1 Resources		
7.1.1 The standard requires that the organisation shall determine and provide the resources needed for the establishment, implementation, maintenance and continual improvement of the sustainable forest management system.	YES	PEFC EST 1003:2022 “7.1.1. The organization shall plan the means to establish, operate and improve the management system in accordance with the long-term objectives of sustainable forest management of the organization.”
7.2 Competence		
7.2.1 The standard requires that forest managers, contractors, employees and forest owners shall be provided with sufficient information and kept up-to-date through continuous training in relation to sustainable forest management, as a precondition for all management planning and practices described in this benchmark.	YES	PEFC EST 1003:2022 “7.2.1. The organization shall ensure that forest management work is carried out by competent persons. Indicators: the employees of the organization have a document certifying their competence (eg professional certificate, professional education, training certificate or a document providing evidence on instruction) or a corresponding requirement has been included in service contracts. 7.2.2. Persons performing forest management work for the organization shall have knowledge of sustainable forest management and shall keep themselves up-to-date through continuous training, including no less than participation in a training or instruction introducing the principles of sustainable forest management. The organization shall provide persons carrying out forest management work with necessary information and ensure trainings on sustainable forest management. Indicators: The organization has provided necessary information on sustainable forest management. Persons performing forest management work have a document providing evidence on knowledge of sustainable forest management (eg a training certificate or a proof of instruction) and/or a corresponding requirement has been included in service contracts. The organization has provided employees with necessary information on relevant legal acts. 7.2.3 Persons working in plantation certified by the organization shall have relevant knowledge of Good Agricultural Practice. Indicators: the persons working in certified plantation are familiar with Good Agricultural Practice.”
7.3 Communication		
7.3.1 The standard requires that effective communication and consultation with local communities, indigenous peoples and other	YES	PEFC EST 1003:2022 “7.3.1 Information on large-scale forestry work in the certified area shall be available to the local community and the immediate neighbour of the work site.

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
stakeholders relating to sustainable forest management shall be provided.		<p>Indicators: the information is available, eg public registers, various communication methods and media of the organization. Feedback channels have been introduced and appeals have been dealt with to ensure effective communication. Engagement meetings have been held if applicable.</p> <p>8.6.3. The historical, cultural and spiritual values provided in national legal acts or agreed upon between the local community and the organization shall be taken into account.</p> <p>Indicators: the organization has preserved cross-trees with registered historical crosses; registered cross-forests and immovable monuments have not been damaged. The values to be preserved (eg graves, tombs, cemeteries, burial mounds, stone fences, grove springs or healing springs, grove stones or worship stones, forest bunkers) and forest management practices in these areas have been agreed upon between the local community and the organization.</p> <p>8.6.4. Forest management shall promote the cultural and socio-economic well-being of the local population in the long term. The local community will be involved in the planning of the forest management work where appropriate.</p> <p>Indicators: the organization has identified significant cultural and key ecosystem services. Justified suggestions made by the local community have been responded and addressed.”</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 EST 1003:2022</p> <p>“7.4.1 The organization shall have a policy for resolving complaints and disputes concerning forest management work, ownership or tenure and working conditions. Disputes and complaints shall be settled in accordance with these principles.”</p>
7.5 Documented Information		
7.5.1 The standard requires that the organisation’s management system shall include documented information required by the standard and determined by the organisation as being necessary for the effectiveness of the sustainable forest management system.	YES	<p>PEFC EST 1003:2022</p> <p>“6.4.2.1 The ownership or possession of each property of the organization shall be unequivocally proved</p> <p>7.5.1 The organization shall document the information related to forest management work.</p> <p>Indicators: the documented information is up-to-date and relevant.</p> <p>9.3.1. The organization shall annually review the management system; the review decision shall include the current situation concerning the activities taken as a result of the previous management review, changes in inputs and internal functioning important for the management system, opportunities and decisions for continuous improvement of the management system, and information about the</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		performance of the activities of the organization, including trends in non-conformities and corrective measures, as well as monitoring and internal audit results identified in the previous audit.”
7.5.2 The standard requires that the documented information is relevant, and updated as appropriate, to the activities of the organisation.	YES	PEFC EST 1003:2022 “7.5.1 The organization shall document the information related to forest management work. Indicators: the documented information is up-to-date and relevant.”
8. Operation		
8.1 Criterion 1: Maintenance or appropriate enhancement of forest resources and their contribution to the global carbon cycle		
8.1.1 The standard requires that management shall aim to maintain or increase forests and their ecosystem services and maintain or enhance the economic, ecological, cultural and social values of forest resources.	YES	PEFC EST 1003:2022 “3. Terms and definitions Buffer strip: a zone (a peripheral zone) with permanent vegetation (mainly trees and shrubs) located between the area of two (or more) different land uses and where special economic techniques are applied to ensure certain functions. The purpose of the buffer strip is to reduce the transboundary effects of economic activities, to ensure the partial preservation of the environment or structures in the managed area, as well as the ecological coherence of neighbouring areas; to provide safe habitat for plants and/or habitats (and feeding sites) for animals, birds and other forest fauna and provide/maintain the aesthetic value of the landscape. No less than shrubs, undergrowth and trees of the second front are left to grow on the buffer strip (the first front may be left if necessary). Riparian buffer strip is a zone with a permanent vegetation along the natural water body to prevent shore erosion, diffuse emissions, sediments and nutrients from entering the water body and to stabilize the shore. A buffer strip can also be a meadow-like community with developed turf. A buffer strip is a strip of five metres unless stipulated otherwise by legal acts. 4.4. A buffer strip is left around the area of the plantation or group of plantations, and in the certified area natural or semi-natural areas with sustainable management that support nature, such as forests, swamps, meadows and other land covers fulfilling environmental, ecological, cultural and/or social functions, are defined as set-aside areas. If there are no natural or semi-natural areas in the certified area, eg forests, swamps, meadows and other land covers, a part of the area suitable for plantation is left for natural development in order to perform nature-supporting functions. 8.1.1. The objective of forest management is the maintenance and enhancement of the forest and its ecosystem services (including the economic, ecological, cultural and social values of forest).

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		Note: In case of plantations the requirement has to be met at least in buffer strips and set-aside areas of plantations.
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 EST 1003:2022 "8.1.2. Climate-friendly and resource-efficient practices in forest management work shall be preferred to maintain or enhance forest stocks and the quality of wood, the ability of carbon sequestration in the future while considering the substitution effect of wood products; as well as avoid significant adverse impacts on forest stock, the quality of wood and/or key ecosystem services."
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 EST 1003:2022 "8.1.2. Climate-friendly and resource-efficient practices in forest management work shall be preferred to maintain or enhance forest stocks and the quality of wood, the ability of carbon sequestration in the future while considering the substitution effect of wood products"
8.1.4 The standard requires that forest conversion shall not occur unless in justified circumstances where the conversion:		
a) is in compliance with national and regional policy and legislation applicable for land use and forest management and is a result of national or regional land-use planning governed by a governmental or other official authority including consultation with affected stakeholders; and	YES	PEFC EST 1003:2022 "8.1.3. Conversion of native forest land to non-forest land is not permitted, except in justified cases: (a) with the permission or approval of a government agency or local authority in accordance with applicable legislation and land use plans; also, as a result of consultations with affected stakeholders;" 8.1.5 Conversion of native forest land (...) to plantations and other man-made/cultural non- forest land is not permitted. Note 1: plantations and other man-made/cultural non-forest land established on native forest land, ecologically valuable non-forest land and heritage landscapes after 31.12.2010 cannot be certified." <i>It shall be noted that due to clause 8.1.5. the conversion of native forest to plantation forest is not at all possible.</i>
b) entails a small proportion (no greater than 5 %) of forest type within the certified area; and	YES	PEFC EST 1003:2022 "8.1.3 (...) (b) it does not cover more than 5% of the forest type class of the certified forest area of the organization



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		Indicators: the organization has relevant documentation (permits/approvals) if required. No more than 5% of the area of forest class of forest growing on mineral soil and peatland forest class has been deforested in certified forest land."
c) does not have negative impacts on ecologically important forest areas, culturally and socially significant areas, or other protected areas; and	YES	PEFC EST 1003:2022 "3. Terms and definitions (...) Ecologically valuable forest: the forest that includes rare, sensitive and representative forest ecosystems contributing significantly, either on their own or in a network, to the productivity, biodiversity and resilience of the ecosystem. Ecologically valuable forests are nature reserves, conservation and limited management zones of protected areas and permanent habitats, registered sites of category I species, and forests voluntarily designated as ecologically valuable by the owner as described in the management plan. Ecologically valuable forest may also be defined as a valuable habitat in a national register or the organization has identified a part of the forest with unique values (source: ST Working Group) 8.1.3 (...) (c) it does not have a significant adverse effect on ecologically, culturally or socially significant areas or on other protected areas"
d) does not destroy areas of significantly high carbon stock; and	YES	PEFC EST 1003:2022 "8.1.3 (...) (d) areas with significant carbon stocks and areas are not deforested." <i>Observation: it is noted that "significant carbon stock" is not further defined and might therefore be difficult to assess, unless this is further defined at national level.</i>
e) makes a contribution to long-term conservation, economic, and social benefits.	YES	PEFC EST 1003:2022 "8.1.3 (...) (c) (...) and creates long-term heritage, nature conservation, socio-economic values"
8.1.5 The standard requires that afforestation of ecologically important non-forest ecosystems shall not occur unless in justified circumstances where the conversion:		
a) is in compliance with national and regional policy and legislation applicable for land use and forest management and is a result of national or regional land-use planning governed by a governmental or other official authority; and	YES	PEFC EST 1003:2022 "8.1.4 Ecologically valuable non-forest land and cultural heritage landscapes shall not be afforested, except in justified cases: (a) with the permission or approval of a government agency or local authority in accordance with applicable legislation and land use plans 8.1.5 Conversion of (...) ecologically valuable non-forest land and heritage landscapes to plantations and other man-made/cultural non- forest land is not permitted.



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		Note 1: plantations and other man-made/cultural non-forest land established on native forest land, ecologically valuable non-forest land and heritage landscapes after 31.12.2010 cannot be certified." <i>It shall be noted that due to clause 8.1.5. the conversion of ecologically valuable non-forest land and heritage landscapes to plantation forest is not at all possible.</i>
b) is established based on a decision-making basis where affected stakeholders have opportunities to contribute to the decision-making on conversion through transparent and participatory consultation processes; and	YES	PEFC EST 1003:2022 "8.1.4 (...) (b) the process is transparent and open and affected stakeholders have had an opportunity to contribute to the process"
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	PEFC EST 1003:2022 "(c) it does not have a significant adverse effect on ecologically, culturally or socially significant areas or on other protected areas and creates long-term heritage, nature conservation, cultural or socio-economic values"
d) entails a small proportion of the ecologically important non-forest ecosystem managed by an organisation; and	YES	PEFC EST 1003:2022 "(e) it does not cover more than 5% of ecologically valuable non-forest land and heritage landscape of the organisation."
e) does not destroy areas of significantly high carbon stock; and	YES	PEFC EST 1003:2022 "(d) it does not damage ecosystems with great carbon sequestration" <i>Observation: it is noted that great carbon sequestration is not further defined and might therefore be difficult to assess, unless this is further defined at national level.</i>
f) makes a contribution to long-term conservation, economic, and social benefits.	YES	PEFC EST 1003:2022 "(c) (...) and creates long-term heritage, nature conservation, cultural or socio-economic values"
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	N.A.	<i>The standard does not include the option to convert severely degraded forests to forest plantations.</i>

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
land-use planning governed by a governmental or other official authority; and		
b) is established based on a decision-making basis where affected stakeholders have opportunities to contribute to the decision-making on conversion through transparent and participatory consultation processes; and	N.A.	<i>The standard does not include the option to convert severely degraded forests to forest plantations.</i>
c) has a positive impact on long-term carbon sequestration capacity of forest vegetation; and	N.A.	<i>The standard does not include the option to convert severely degraded forests to forest plantations.</i>
d) does not have negative impacts on ecologically important forest areas, culturally and socially significant areas, or other protected areas; and	N.A.	<i>The standard does not include the option to convert severely degraded forests to forest plantations.</i>
e) safeguards protective functions of forests for society and other regulating or supporting ecosystem services; and	N.A.	<i>The standard does not include the option to convert severely degraded forests to forest plantations.</i>
f) safeguards socio-economic functions of forests, including the recreational function and aesthetic values of forests and other cultural services; and	N.A.	<i>The standard does not include the option to convert severely degraded forests to forest plantations.</i>
g) has a land history providing evidence that the degradation is not the consequence of deliberate poor forest management practices; and	N.A.	<i>The standard does not include the option to convert severely degraded forests to forest plantations.</i>
h) is based on credible evidence demonstrating that the area is neither recovered nor in the process of recovery.	N.A.	<i>The standard does not include the option to convert severely degraded forests to forest plantations.</i>
8.2 Criterion 2: Maintenance of forest ecosystem health and vitality		
8.2.1 The standard requires that health and vitality of forest ecosystems shall be maintained or enhanced and degraded forest ecosystems shall be rehabilitated wherever and as far as economically feasible, by	YES	PEFC EST 1003:2022 "4.4. A buffer strip is left around the area of the plantation or group of plantations, and in the certified area natural or semi-natural areas with sustainable management that support nature, such as forests, swamps, meadows and other land covers fulfilling environmental, ecological, cultural and/or social

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
making best use of natural structures and processes and using preventive biological measures.		<p>functions, are defined as set-aside areas. If there are no natural or semi-natural areas in the certified area, eg forests, swamps, meadows and other land covers, a part of the area suitable for plantation is left for natural development in order to perform nature-supporting functions.</p> <p>8.2.1. The good status of the ecosystem shall be maintained or enhanced, if necessary in the forest by making the best use of the forest structure and natural processes. A damaged or gradually impoverished ecosystem with reduced ecological integrity (degraded ecosystem) shall be restored wherever and as far as economically feasible or left to natural development (succession).</p> <p>Note: In case of plantations the requirement has to be met at least in buffer strips and set-aside areas of plantations."</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 EST 1003:2022</p> <p>"4.4. A buffer strip is left around the area of the plantation or group of plantations, and in the certified area natural or semi-natural areas with sustainable management that support nature, such as forests, swamps, meadows and other land covers fulfilling environmental, ecological, cultural and/or social functions, are defined as set-aside areas. If there are no natural or semi-natural areas in the certified area, eg forests, swamps, meadows and other land covers, a part of the area suitable for plantation is left for natural development in order to perform nature-supporting functions.</p> <p>8.2.2 The viability and resilience of the forest to adverse environmental factors shall be ensured to contribute to the maintenance of the genetic, species and structural diversity of the forest; the natural regulation mechanisms shall be supported.</p> <p>Note: In case of plantations the requirement has to be met at least in buffer strips and set-aside areas of plantations."</p>
8.2.3 The standard requires that use of fire shall be limited to regions where fire is an essential tool in forest management for regeneration, wildfire protection and habitat management or a recognized practice of indigenous peoples. In these cases adequate management and control measures shall be taken.	YES	<p>PEFC EST 1003:2022</p> <p>"8.2.4 The use of fire in forest management work is prohibited, except in case of burning of slash collected into piles or heaps at the felling site pursuant to the Forest Act; also, in case it is justified (for the purpose of regeneration or nature conservation) and approved by the Rescue Board."</p>
8.2.4 The standard requires that appropriate forest management practices such as reforestation and afforestation with tree species and provenances that	YES	<p>PEFC EST 1003:2022</p> <p>"8.4.1. The planning of forest management work shall take into account the preservation and conservation of biodiversity of local origin at landscape, ecosystem, species, as well as genetic level.</p>

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
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.		Note: the requirement does not necessarily apply to plantations and other man-made/cultural non-forest land, except for in case of using the species endangering the biodiversity of neighbouring areas. 8.4.3. Planning and carrying out forest management work shall aim at preserving ecologically valuable forest by means of excluding such forest from management or using techniques that do not significantly damage ecological values but rather promote the maintenance or development of the values and enrich the forest structure."
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.	NO	PEFC EST 1003:2022 "8.2.5. The organization shall not take litter into the forest and the spillage of oil and fuel shall be prevented during forest management work. The organization and/or contractor shall have preparedness for the prevention and elimination of the spillage of oil and fuel and littering. The organization shall develop measures for avoiding accidental littering. Inorganic waste and litter are collected and disposed of in an environmentally sustainable manner." <i>The wording "during forest management work" limits this requirement for forest operations, but the requirement is generally applicable for the certified forest.</i>
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 EST 1003:2022 "8.2.6 Biological measures and means shall be preferred to prevent and restrain damage to the forest. The use of non-biological plant protection products on forest land is permitted only in justified cases."
8.2.7 The standard requires that any use of pesticides is documented.	YES	PEFC EST 1003:2022 "8.2.7 The use of non-biological plant protection products 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 EST 1003:2022 "8.2.8 The use of plant protection products of hazard classes 1A and 1B according to World Health Organization (WHO) and other very toxic plant protection products is prohibited."
8.2.9 The standard requires that pesticides, such as chlorinated hydrocarbons whose derivatives remain biologically active and accumulate in the food chain	YES	PEFC EST 1003:2022 "8.2.9 The use of plant protection products containing glyphosate and other Chlorinated Hydrocarbons and Persistent Organic Pollutants is prohibited on forest land."



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
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.		
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 EST 1003:2022 "8.2.10 The use of plant protection products shall be carried out in accordance with the instructions of the manufacturer, employees shall be trained, instructed and provided with appropriate personal protective 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.	NO	PEFC EST 1003:2022 "8.2.11 Only organic fertilizers, natural mineral fertilizers, natural soil improvers, biostimulants and bioregulators can be used on forest land, unless prohibited by national legislation. The use of fertilizers shall be controlled and not harmful to the environment. Supporting the natural processes of soil shall be preferred to fertilization. Note 1: natural mineral fertilizers are eg wood ash, peat ash, straw, hay and root ash; soil improvers are lime, dolomite powder, oil shale ash. Note 2: In case of plantations the requirement has to be met at least in buffer strips and set-aside areas of plantations." <i>Due to note 2 in clause 8.2.11 it is insufficiently ensured that fertiliser use in the commercial stands of plantations shall be applied in a controlled manner and with due consideration for the environment, where the fertilizer use shall not be an alternative to appropriate soil nutrient management.</i>
8.3 Criterion 3: Maintenance and encouragement of productive functions of forests (wood and non-wood)		
8.3.1 The standard requires that the capability of forests to produce a range of wood and non-wood forest products and services on a sustainable basis shall be maintained.	YES	PEFC EST 1003:2022 "8.3.1 The capacity of the forest to produce timber and/or provide other key ecosystem services shall be maintained after the completion of forest management work. 8.3.3 Forest management work shall be carried out at a time and in a way that does not reduce the capacity of forest to produce wood and non-wood forest products and/or other key ecosystem services."

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
8.3.2 The standard requires that sound economic performance shall be pursued, taking into account possibilities for new markets and economic activities in connection with all relevant goods and services of forests.	YES	PEFC EST 1003:2022 "8.3.2 The organization shall take into account potential market changes regarding wood, commercial non-wood forest products and other key ecosystem services when planning its economic activities, as well as achieve good results."
8.3.3 The standard requires that management, harvesting and regeneration operations shall be carried out at a time, and in a way, that does not reduce the productive capacity of the site, for example by avoiding damage to soil and retained stands and trees.	YES	PEFC EST 1003:2022 "8.3.3 Forest management work shall be carried out at a time and in a way that does not reduce the capacity of forest to produce wood and non-wood forest products and/or other key ecosystem services. Indicators: soil and retained trees have not been significantly damaged. Forest management work on protected natural objects has been carried out in accordance with the requirements set out in the protection management plan and other requirements (eg work has been carried out on frozen or dry soil). Conditions for maintaining the capacity of the forest to produce key ecosystem services have been granted."
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	PEFC EST 1003:2022 "8.3.4 The harvesting level and the uses of wood, commercial non-wood forest products and/or other key ecosystem services shall be optimal to ensure long-term sustainability of forest productivity."
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 EST 1003:2022 "8.3.5 Forest improvement infrastructure shall be designed, built, reconstructed, upgraded and maintained to improve the availability of wood, commercial non- wood forest products and other key ecosystem services with the least possible damage to the environment. Indicators: the organization has a clear understanding of the activities related to the forest improvement infrastructure; work projects and appropriate approvals for the construction, reconstruction and renewal of the forest improvement infrastructure are in place. The habitats of the protected species, environmental protection requirements and other restrictions have been taken into account in the course of the work."
8.4 Criterion 4: Maintenance, conservation and appropriate enhancement of biological diversity in forest ecosystems		

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
8.4.1 The standard requires that management planning shall aim to maintain, conserve or enhance biodiversity on landscape, ecosystem, species and genetic levels.	YES	<p>PEFC EST 1003:2022</p> <p>“4.4. A buffer strip is left around the area of the plantation or group of plantations, and in the certified area natural or semi-natural areas with sustainable management that support nature, such as forests, swamps, meadows and other land covers fulfilling environmental, ecological, cultural and/or social functions, are defined as set-aside areas. If there are no natural or semi-natural areas in the certified area, eg forests, swamps, meadows and other land covers, a part of the area suitable for plantation is left for natural development in order to perform nature-supporting functions.</p> <p>8.4.1. The planning of forest management work shall take into account the preservation and conservation of biodiversity of local origin at landscape, ecosystem, species, as well as genetic level.</p> <p>Note: In case of plantations the requirement has to be met at least in buffer strips and set-aside areas of plantations.”</p>
8.4.2 The standard requires that inventory, mapping and planning of forest resources shall identify, protect, conserve or set aside ecologically important forest areas. Note: This does not prohibit forest management activities that do not damage the important ecologic values of those biotopes.	YES	<p>PEFC EST 1003:2022</p> <p>“8.4.2. Ecologically valuable forest shall be identified and mapped in the course of forest inventories on the basis of national registers and/or the voluntary decision of the organization.</p> <p>8.4.3. Planning and carrying out forest management work shall aim at preserving ecologically valuable forest by means of excluding such forest from management or using techniques that do not significantly damage ecological values but rather promote the maintenance or development of the values and enrich the forest structure.”</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. Note: The requirement does not preclude trade according to CITES requirements.	YES	<p>PEFC EST 1003:2022</p> <p>“8.4.4. Protected species shall not be marketed unless permitted by legal acts and CITES – the Convention on International Trade in Endangered Species of Wild Fauna and Flora. The organization shall take measures for the protection of protected, endangered and vulnerable species, as well as increasing their population, if applicable.”</p>
8.4.4 The standard requires that successful regeneration shall be ensured through natural regeneration or planting that is adequate to ensure the quantity and quality of the forest resources.	YES	<p>PEFC EST 1003:2022</p> <p>“8.4.5. The forest shall be regenerated in a way that ensures the long-term sustainability and productivity of the forest and/or key ecosystem services.”</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
<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 EST 1003:2022</p> <p>“8.4.6. The cultivating material suitable for the habitat type and originating from a permitted region shall be used for reforestation and afforestation. Invasive and/or alien species and hybrids prohibited in Estonia shall not be used in the plantation.</p> <p>Indicators: the species and hybrids originating from a permitted region of origin have been used for reforestation and afforestation. Invasive and/or alien species and hybrids prohibited in Estonia have not been used in the plantation.”</p> <p>Explanation provided by EFCC</p> <p>“According to §57 of the Nature Conservation Act it is prohibited to plant or sow non-native plants in the wild.</p> <p>In Estonia activities concerning non-native plants are also performed pursuant to EU REGULATION No 1143/2014 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 22 October 2014 on the prevention and management of the introduction and spread of invasive alien species.</p> <p>In Estonia supplying of cultivating material is regulated pursuant to Plant Propagation and Plant Variety Rights Act and Plant Protection Act. §63 of the Plant Propagation and Plant Variety Rights Act provides a requirement for the supplier to register officially, ie. submit a notice of economic activities before commencing its activities. Supplied cultivating material is subject to state control and therefore, the movement of the cultivating material can be monitored. According to Regulation (EU) 2016/2031 of the European Parliament of the Council of 26 October 2016 on protective measures against pests of plants, all plants must be provided with plant passports specifying information about tree species, official registration, monitoring and country of origin.</p> <p>Council Directive 1999/105/EC of 22 December 1999 on the marketing of forest reproductive material is the basis for the use of cultivating material. These principles are provided in the Plant Propagation and Plant Variety Rights Act and Regulation No 20 of 01.07.2016 of the Minister of the Environment.</p> <p>According to Commission Regulation (EC) No 1598/2002 of 6 September 2002 laying down detailed rules for the application of Council Directive 1999/105/EC as regards the provision of mutual administrative assistance by official bodies) the delivering country is obliged to provide the receiving country with information about the supplied material. In addition, the delivering country is obliged to provide additional information upon the request of the receiving country. According to the previously mentioned provision it is possible to ask for various information about the research material on</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>imported plants, including information about adaption, propagation, breeding, origin etc to be able to decide on their suitability in Estonian climate conditions.</p> <p>When using cultivation material for forestry purposes, it does not matter if it is planted in a non-forest land or in a forest.</p> <p>In case of import a member state has the right to make decisions in this area of activity according Council Decision of 16 December 2008 (2008/971/EC) on the equivalence of forest reproductive material produced in third countries. In general, import is allowed, if the member state has not got suitable plant varieties. It is usual to include inter alia, research in making discretionary decisions. The decision can either be formalized as an import permit or refusal thereof."</p>
<p>8.4.6 The standard requires that afforestation, reforestation and other tree planting activities that contribute to the improvement and restoration of ecological connectivity shall be promoted.</p>	<p>NO</p>	<p>PEFC EST 1003:2022</p> <p>"8.4.7. The techniques contributing to maintaining, improving, recovering or restoring the ecological spatio-temporal coherence of the forest shall be preferred in forest management work.</p> <p>Note: In case of plantations the requirement has to be met at least in buffer strips and set-aside areas of plantations.</p> <p>Indicators: the organization has used necessary methods of work, as a result, there are structures and characteristics ensuring the ecological spatio-temporal coherence of the forest in the audited entity, eg retention trees of different species, groups of retention trees with the second layer and/or undergrowth; wood of different decomposition state (eg standing and lying dead trees, decomposed wood, stumps); buffer strips have been left; forest microstructures, forest of different composition and age, natural growth and diversity of undergrowth, as well as birds, animals, plants, mosses, lichens, fungi, etc of significant importance indicating the biological state and diversity of the forest have been preserved.</p> <p>Single retention trees or groups of retention trees have been left in the clear-cut area of 3 ha to ensure coherence; in case of areas over 3 ha groups of retention trees have been preferred.</p> <p>At least twice as many retention trees as required in the commercial forest have been left at the known site of category I and II species in the protected natural object. Trees and shrubs providing nectar and pollen are located mainly on the open edges of the felling sites (eg roads, division lines between compartments, ditches, shores of water bodies) or at least half of the canopy of these trees and bushes is exposed to light to enable them to develop blossoms.</p>

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>Note or explanation to the buffer strip indicator: buffer strips are primarily left on the edge of the felling site adjacent to agricultural land, semi-natural grassland, bog or natural water-body. In case of suitable conditions, existing standing and lying dead trees shall be preserved and retention trees or groups of retention trees shall be left growing. The number of standing dead trees can be increased by stubbing, particularly in habitat types with a higher risk of wind-throw.”</p> <p><i>The exemption provided for forest plantations in the note of the clause does not meet the PEFC benchmark requirement, as afforestation, reforestation and other tree planting activities that contribute to the improvement and restoration of ecological connectivity shall also be promoted within plantations.</i></p>
<p>8.4.7 The standard requires that genetically-modified trees shall not be used.</p> <p>Note: The restriction on the usage of genetically-modified trees has been adopted by the PEFC General Assembly based on the Precautionary Principle. Until enough scientific data on genetically modified trees indicates that impacts on human and animal health and the environment are equivalent to, or more positive than, those presented by trees genetically improved by traditional methods, no genetically-modified trees will be used.</p>	YES	<p>PEFC EST 1003:2022</p> <p>“8.4.8. The use of genetically-modified cultivating material is prohibited.</p> <p>Indicators: data on the origin of the cultivating material have been used.”</p>
<p>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.</p>	YES	<p>PEFC EST 1003:2022</p> <p>“8.4.7. The techniques contributing to maintaining, improving, recovering or restoring the ecological spatio-temporal coherence of the forest shall be preferred in forest management work.</p> <p>Note: In case of plantations the requirement has to be met at least in buffer strips and set-aside areas of plantations.</p> <p>8.4.9. Techniques aiming at maintaining or improving the structural variability of the forest and the diversity of the micro-habitats shall be preferred in the course of forest management work.</p> <p>Note: In case of plantations the requirement has to be met at least in buffer strips and set-aside areas of plantations.</p> <p>Indicators: in particular, the variability in the composition, age, layer and landscape of the stand is being considered. The organization has used appropriate techniques; as a result, there is lying and standing</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		dead wood, natural regeneration and diversity of undergrowth in the forest; also, plants producing nectar and pollen have been left growing. Micro-scale landforms have not been significantly damaged. In case of suitable conditions and possibilities there are mixed stands, clear-cut strips and stands of different age and tree species in the landscape."
8.4.9 The standard requires that traditional management practices that create valuable ecosystems on appropriate sites shall be supported, where appropriate.	YES	PEFC EST 1003:2022 "8.4.7. The techniques contributing to maintaining, improving, recovering or restoring the ecological spatio-temporal coherence of the forest shall be preferred in forest management work. Note: In case of plantations the requirement has to be met at least in buffer strips and set-aside areas of plantations. 8.4.9. Techniques aiming at maintaining or improving the structural variability of the forest and the diversity of the micro-habitats shall be preferred in the course of forest management work. Note: In case of plantations the requirement has to be met at least in buffer strips and set-aside areas of plantations."
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	PEFC EST 1003:2022 "8.4.10. Forest management work shall be carried out in a way that it does not cause permanent damage to the forest as an ecosystem. Measures shall be taken to maintain or enhance forest structure and biodiversity and/or key ecosystem services where possible. Note: In case of plantations the requirement has to be met at least in the buffer strips and set-aside areas of plantations; permanent damage to the soil shall not be caused in the plantation area."
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	PEFC EST 1003:2022 "8.4.11. The impact of the planned work shall be assessed in the design and construction of the forest improvement infrastructure and solutions with the least negative impacts on ecologically valuable forest, ecologically valuable non-forest land and natural water bodies shall be found. In case of significant adverse impacts mitigation measures shall be taken. Indicators: impacts and risks have been assessed in the design and construction of forest improvement infrastructure. Required state permits/approvals have been obtained. In case of negative effects mitigation measures have been taken."
8.4.12 The standard requires that, with due regard to management objectives, measures shall be taken to	YES	PEFC EST 1003:2022

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.		"8.4.12. Measures shall be taken to reduce extensive game damage. In order to reduce extensive game damage to the forest, forest ecosystem and key ecosystem services, measures must be taken to ensure optimal condition."
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 EST 1003:2022</p> <p>"8.4.13. Ecologically important structural elements (eg standing and lying dead trees, hollow trees, trees with traces of burning, areas of old trees, infrequent tree species in the stand, large rocks, stone fences, natural kettle holes) shall be maintained while carrying out forest management work to preserve biodiversity taking into account their impact on the health of the forest, the quality of timber and the state of the ecosystem, neighbouring ecosystems and safety of people.</p> <p>Note: In case of plantations the requirement has to be met at least in buffer strips and set-aside areas of plantations."</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 EST 1003:2022</p> <p>"3. Terms and definitions</p> <p>Forests with the function of balancing the environment: forests mitigating the extreme natural processes, such as the forest reducing the erosion on steep slopes and the floodplain forest buffering floods. Also, buffer strips have a balancing function.</p> <p>8.5.1. The role of the forest in balancing the environment such as its role in reducing erosion and flooding, buffering water regimes, regulating the climate, ensuring carbon sequestration and/or providing other key ecosystem services to the society shall be maintained or enhanced.</p> <p>Indicators: riparian buffer strips have been left by the shores of natural water bodies. The soil of the riparian buffer strips has not been damaged. The organization has identified significant cultural and socio-economic ecosystem services.</p> <p>Note to the riparian buffer strip indicator: shrubs, undergrowth and the trees of the second layer have been left growing on the riparian buffer strip. In case of suitable conditions, the existing standing and lying dead trees shall be preserved and retention trees or groups of retention trees shall be left growing. The buffer strip can also be a meadow-like community with developed turf."</p>
8.5.2 The standard requires that areas that fulfil specific and recognised protective functions for society	YES	<p>PEFC EST 1003:2022</p> <p>"3. Terms and definitions</p>

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
shall be mapped, and forest management plans and operations shall ensure the maintenance or enhancement of these functions.		<p>Forests with the function of balancing the environment: forests mitigating the extreme natural processes, such as the forest reducing the erosion on steep slopes and the floodplain forest buffering floods. Also, buffer strips have a balancing function.</p> <p>8.5.2. The organization shall have an overview of significant forests with the function of environmental protection and forests with the function of balancing the environment, and the management of these forests shall ensure the long-term preservation of these functions.</p> <p>Indicators: the organization has mapped significant forests with the function of environmental protection and forests with the function of balancing the environment. The list of stand compartments that can be identified on the map and in nature is also deemed as being mapped."</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 EST 1003:2022</p> <p>"8.4.12. Measures shall be taken to reduce extensive game damage. In order to reduce extensive game damage to the forest, forest ecosystem and key ecosystem services, measures must be taken to ensure optimal condition.</p> <p>8.5.3. The time, machinery and techniques appropriate to forest management work shall be used to minimize damage to the soil, prevent erosion and sediment transfer to water bodies, as well as prevent clogging of waterways. Special attention shall be paid to forest management work carried out on thin and other sensitive soils and in erosion-prone areas.</p> <p>Note: the requirement of the prevention of the clogging of waterways does not apply to the areas of restoration of bog habitats and forests characterized by excessive moisture.</p> <p>Indicators: watercourses (streams, ditches, rivers) are not clogged after the completion of forest management work. Riparian buffer strips have been left along the shores of natural water bodies. The soil of the riparian buffer strips is not damaged or contaminated and timber, fuel or lubricants have not been stored on the buffer strip.</p> <p>Note to the riparian buffer strip indicator: shrubs, undergrowth and the trees of the second layer have been left growing on the riparian buffer strip. In case of suitable conditions, the existing standing and lying dead trees shall be preserved and retention trees or groups of retention trees shall be left growing. The buffer strip can also be a meadow-like community with developed turf."</p>
8.5.4 The standard requires that special care shall be given to forestry operations in forest areas with water protection functions to avoid adverse effects on the	YES	PEFC EST 1003:2022



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
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.		<p>“8.5.3. The time, machinery and techniques appropriate to forest management work shall be used to minimize damage to the soil, prevent erosion and sediment transfer to water bodies, as well as prevent clogging of waterways.</p> <p>8.5.4. Fuels and lubricants and plant protection products shall be prevented from entering water bodies in the course of forest management work.</p> <p>Indicators: fuels, lubricants and plant protection products have not entered in water bodies. It has been ensured that refuelling and the use of tankers does not pollute water bodies (eg tankers with special nozzles, double walls or safety enclosures are used to prevent leakage, storing fuel in special fuel canisters).</p> <p>8.5.5. In the course of the construction, reconstruction and renewal of forest improvement infrastructure the damage to the surface must be kept to a minimum and the watercourses shall be prevented from clogging to preserve the natural water regime of the watercourse as much as possible, reduce the reaching of sediments to the upstream catchment and natural watercourses and prevent the release of fuels and lubricants into watercourses.”</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 EST 1003:2022</p> <p>“8.5.5. In the course of the construction, reconstruction and renewal of forest improvement infrastructure the damage to the surface must be kept to a minimum and the watercourses shall be prevented from clogging to preserve the natural water regime of the watercourse as much as possible, reduce the reaching of sediments to the upstream catchment and natural watercourses and prevent the release of fuels and lubricants into watercourses.</p> <p>Indicators: the natural condition of the natural water body has been preserved and, if necessary, sediment ponds, etc have been established to prevent damage. Watercourses (streams, ditches, rivers) are not blocked after the completion of the forest improvement work. Fuels or lubricants have not entered water bodies.”</p> <p><i>No reference is found that proper road drainage facilities shall be installed and maintained.</i></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 EST 1003:2022</p> <p>“4.4. A buffer strip is left around the area of the plantation or group of plantations, and in the certified area natural or semi-natural areas with sustainable management that support nature, such as forests, swamps, meadows and other land covers fulfilling environmental, ecological, cultural and/or social</p>

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>functions, are defined as set-aside areas. If there are no natural or semi-natural areas in the certified area, eg forests, swamps, meadows and other land covers, a part of the area suitable for plantation is left for natural development in order to perform nature-supporting functions.</p> <p>8.6.1. The cultural and socio-economic values of the forest shall be considered in carrying out forest management work.</p> <p>Note: In case of plantations the requirement has to be met at least in buffer strips and set-aside areas of plantations.”</p>
8.6.2 The standard requires that adequate public access to forests for the purpose of recreation shall be provided, taking into account respect for ownership rights, safety and the rights of others, the effects on forest resources and ecosystems, as well as compatibility with other functions of the forest.	YES	<p>PEFC EST 1003:2022</p> <p>“8.6.2. The organization shall not impose unreasonable restrictions on the right of entry in the forest. According to the right of entry, the forest is open to everyone, taking into account the characteristics of the economic activities of the organization. Restrictions are permitted in justified cases, such as the protection of property rights, ensuring the health of the forest, gaining financial benefit for the provision of key ecosystem services, prevention of deliberate littering and ensuring safety or in case the provision of ecosystem services may threaten the preservation of natural habitats.</p> <p>Indicators: the use of the forest is possible within the framework of the right of entry, restrictions to the right of entry have been appropriately justified. In recreational forests it is possible to use the trails and roads after the completion of the forest management work.”</p>
8.6.3 The standard requires that sites with recognised specific historical, cultural or spiritual significance and areas fundamental to meeting the needs of indigenous peoples and local communities (e.g. health, subsistence) shall be protected or managed in a way that takes due regard of the significance of the site.	YES	<p>PEFC EST 1003:2022</p> <p>“8.6.3. The historical, cultural and spiritual values provided in national legal acts or agreed upon between the local community and the organization shall be taken into account.</p> <p>Indicators: the organization has preserved cross-trees with registered historical crosses; registered cross-forests and immovable monuments have not been damaged. The values to be preserved (eg graves, tombs, cemeteries, burial mounds, stone fences, grove springs or healing springs, grove stones or worship stones, forest bunkers) and forest management practices in these areas have been agreed upon between the local community and the organization.”</p>
8.6.4 The standard requires that management shall promote the long-term health and well-being of communities within or adjacent to the forest management area, where appropriate supported by	YES	<p>PEFC EST 1003:2022</p> <p>“8.6.4. Forest management shall promote the cultural and socio-economic well-being of the local population in the long term. The local community will be involved in the planning of the forest management work where appropriate.</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
engagement with local communities and indigenous peoples.		Indicators: the organization has identified significant cultural and key ecosystem services. Justified suggestions made by the local community have been responded and addressed."
8.6.5 The standard requires that the best use shall be made of forest-related experience and traditional knowledge, innovations and practices such as those of forest owners, NGOs, local communities, and indigenous peoples. Equitable sharing of the benefits arising from the utilization of such knowledge shall be encouraged.	YES	PEFC EST 1003:2022 "8.6.4. Forest management shall promote the cultural and socio-economic well-being of the local population in the long term. The local community will be involved in the planning of the forest management work where appropriate. 8.6.5. The best use is made of the traditional knowledge and innovative ideas of the local communities and the benefits and costs arising from the utilization of such knowledge are being shared equitably. Indicators: in case the traditional knowledge and innovative ideas of the local communities have been used, agreements with local communities have been concluded and documented, as appropriate."
8.6.6 The standard requires that management shall give due regard to the role of forestry in local economies. Special consideration shall be given to new opportunities for training and employment of local people, including indigenous peoples.	YES	PEFC EST 1003:2022 "8.6.6. The organization shall take into account and promote the role of forestry in Estonian economy and local socio-economic well-being; therefore, attention is paid to the employment of the people in the region, as well as to the need of the businesses for raw material in Estonia."
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	PEFC EST 1003:2022 "8.6.7. The organization shall enable research in its forest, taking into account the ownership, the specific character of the economic activities of the organization, the safety of the people and the impact on forest resources and timber quality, as well as key ecosystem services. Research that supports sustainable forest management is preferred in PEFC-certified forests. Indicators: the organization has not created unreasonable obstacles to research or has entered into necessary agreements with researchers."
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	PEFC EST 1003:2022 "9.1.1. The organization shall periodically evaluate the change in forest resources, the quality of the forest management work and its impact on forest and key ecosystem services, and correct its activities, if necessary. The organization shall also assess the environmental, social and economic impact of the forest management work."



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
9.1.2 The standard requires that health and vitality of forests shall be periodically monitored, especially key biotic and abiotic factors that potentially affect health and vitality of forest ecosystems, such as pests, diseases, overgrazing and overstocking, fire, and damage caused by climatic factors, air pollutants or by forest management operations.	YES	PEFC EST 1003:2022 “9.1.2. The existence of natural and man-made damage and its impact on the health of the forest and the quality of key ecosystem services shall be periodically monitored and corrected, if necessary. Indicators: natural and man-made damage has been registered. The organization has set monitoring frequency.”
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 EST 1003:2022 “3. Terms and definitions (...) Non-wood forest products: Christmas trees, whisks, nuts, berries, mushrooms, game, honey, etc., which may also be derived from plantations and non-forest land (source: ST Working Group) 6.3.5. In case the management plan covers the commercial use of non-wood forest products and other key ecosystem services by the organization, the organization shall include the annually allowable use and/or area of commercial non-wood forest products and other key ecosystem services ensuring their long-term sustainability. 8.6.2. The organization shall not impose unreasonable restrictions on the right of entry in the forest. According to the right of entry, the forest is open to everyone, taking into account the characteristics of the economic activities of the organization. Restrictions are permitted in justified cases, such as the protection of property rights, ensuring the health of the forest, gaining financial benefit for the provision of key ecosystem services, prevention of deliberate littering and ensuring safety or in case the provision of ecosystem services may threaten the preservation of natural habitats. 9.1.3. The organization shall regularly monitor and evaluate the use and condition of commercial non-wood forest products and correct its activities, if necessary. Indicators: the organization has monitored and evaluated the use and condition of commercial non-wood forest products. The organization has set monitoring frequency.”
9.1.4 The standard requires that working conditions shall be regularly monitored and adapted as necessary.	YES	PEFC EST 1003:2022 “9.1.4. The organization shall regularly monitor the compliance with occupational health and safety requirements and correct its activities, if necessary.”
9.2 Internal audit		



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
9.2.1 Objectives The standard requires that an internal audit programme at planned intervals shall provide information on whether the management system		
a) conforms to <ul style="list-style-type: none"> the organisation's requirements for its management system; the requirements of the national sustainable forest management standard 	YES	PEFC EST 1003:2022 "5.3.2. The organization shall systematically improve the management system in accordance with the requirements of sustainable forest management. 9.2.1. The organization shall, no less than once during the certification period, analyse its activities in planning and performing the work and the compliance of the activities with the requirements of the PEFC standard. 9.2.2. The organization shall: a) plan, establish, implement and maintain an internal audit programme including the frequency, methods, responsibilities, planning requirements and reporting of internal audits and take into consideration the importance of the processes concerned and the results of previous internal audits; 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; 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."
b) is effectively implemented and maintained.	YES	PEFC EST 1003:2022 "9.3.1. The organization shall annually review the management system; the review decision shall include the current situation concerning the activities taken as a result of the previous management review, changes in inputs and internal functioning important for the management system, opportunities and decisions for continuous improvement of the management system, and information about the performance of the activities of the organization, including trends in non-conformities and corrective measures, as well as monitoring and internal audit results identified in the previous audit. Indicators: the management system is functioning effectively. Necessary corrective measures have been taken. Trends, non-conformities and corrective measures, as well as possibilities for constant improving of the management system have been discussed at management level. Decisions on continuous improvement of the management system, as well as making amendments to the management system if applicable, have been made. The results of the review by the management have been documented."



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
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 EST 1003:2022 "9.2.2. The organization shall: a) plan, establish, implement and maintain an internal audit programme including the frequency, methods, responsibilities, planning requirements and reporting of internal audits and take into consideration the importance of the processes concerned and the results of previous internal audits."
b) define the audit criteria and scope for each audit;	YES	PEFC EST 1003:2022 "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 EST 1003:2022 "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 EST 1003:2022 "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 EST 1003:2022 "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 EST 1003:2022 "9.3.1. The organization shall annually review the management system; the review decision shall include the current situation concerning the activities taken as a result of the previous management review (...) Indicators: the management system is functioning effectively. Necessary corrective measures have been taken."
b) changes in external and internal issues that are relevant to the management system;	YES	"9.3.1. The organization shall annually review the management system; the review decision shall include (...) changes in inputs and internal functioning important for the management system"

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
c) information on the organisation's performance, including trends in: <ul style="list-style-type: none"> • nonconformities and corrective actions; • monitoring and measurement results; • audit results; 	YES	PEFC EST 1003:2022 "9.3.1. The organization shall annually review the management system; the review decision shall include (...) information about the performance of the activities of the organization, including trends in non-conformities and corrective measures, as well as monitoring and internal audit results identified in the previous audit. (...) Indicators: (...) Trends, non-conformities and corrective measures (...), as well as possibilities for constant improving of the management system have been discussed at management level."
d) opportunities for continual improvement	YES	PEFC EST 1003:2022 "9.3.1. The organization shall annually review the management system; the review decision shall include (...) opportunities and decisions for continuous improvement of the management system (...) Indicators: (...) possibilities for constant improving of the management system have been discussed at management level. Decisions on continuous improvement of the management system, as well as making amendments to the management system if applicable, have been made."
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	PEFC EST 1003:2022 "5.3.3. The organization shall establish principles for a management system and designate a person(s) responsible for the implementation of the requirements of the PEFC standard. Note: in case the organization is a natural person, the natural person is by default responsible for meeting the requirements of the PEFC standard, unless the natural person has authorized someone else to be held responsible. 9.3.1. The organization shall annually review the management system; the review decision shall include (...) opportunities and decisions for continuous improvement of the management system (...) Indicators: (...) Decisions on continuous improvement of the management system, as well as making amendments to the management system if applicable, have been made."
9.3.3 The standard requires that documented information as evidence of the results of management reviews shall be retained.	YES	PEFC EST 1003:2022 "9.3.1. The organization shall annually review the management system; (...) Indicators: (...) The results of the review by the management have been documented."
10. Improvement		
10.1 Nonconformity and corrective action		
10.1.1 The standard requires that when a nonconformity occurs, the 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 EST 1003:2022 "10.1.1. When a nonconformity with the standard is detected in the course of audit, the organization shall react to the nonconformity and 10.1.1.1. assess the reasons for the nonconformity; 10.1.1.2. plan measures to prevent the recurrence of the nonconformity and, if possible, eliminate it; 10.1.1.3. address the results of the nonconformities;"
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 EST 1003:2022 "10.1.1.1. assess the reasons for the nonconformity; 10.1.1.2. plan measures to prevent the recurrence of the nonconformity and, if possible, eliminate it;"
c) implement any action needed;	YES	PEFC EST 1003:2022 "10.1.1.2. plan measures to prevent the recurrence of the nonconformity and, if possible, eliminate it;"
d) review the effectiveness of any corrective action taken;	YES	PEFC EST 1003:2022 "10.1.1.4. assess the effectiveness of the corrective action."
e) make changes to the management system, if necessary.	YES	PEFC EST 1003:2022 "10.1.1.4. assess the effectiveness of the corrective action. Indicators: the causes for the nonconformity have been assessed and measures for the prevention of the recurrence of the nonconformity have been planned (including at management level). (...) Changes to the management system have been made, if necessary."
10.1.2 The standard requires that corrective actions shall be appropriate to the effects of the nonconformities encountered.	YES	PEFC EST 1003:2022 "10.1.1.4. assess the effectiveness of the corrective action. Indicators: (...) Corrective action shall be in compliance with the impact of the identified nonconformity."
10.1.3 The standard requires that the organisation shall retain documented information as evidence of:		

PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
a) the nature of the nonconformities and any subsequent actions taken;	YES	PEFC EST 1003:2022 "10.1.1. When a nonconformity with the standard is detected in the course of audit, the organization shall react to the nonconformity (...) Indicators: (...) The nonconformities and corrective actions of the organization have been documented."
b) the results of any corrective action.	YES	PEFC EST 1003:2022 "10.1.1. When a nonconformity with the standard is detected in the course of audit, the organization shall react to the nonconformity and 10.1.1.4. assess the effectiveness of the corrective action. Indicators about the clause 10.1.1.: the causes for the nonconformity have been assessed and measures for the prevention of the recurrence of the nonconformity have been planned (including at management level). Corrective action shall be in compliance with the impact of the identified nonconformity. Changes to the management system have been made, if necessary. The nonconformities and corrective actions of the organization, as well as the assessment of the efficiency of corrective measures have been documented."
10.2 Continual improvement The standard requires that the suitability, adequacy and effectiveness of the sustainable forest management system and the sustainable management of the forest shall be continuously improved.	YES	PEFC EST 1003:2022 "5.3.2. The organization shall systematically improve the management system in accordance with the requirements of sustainable forest management. 10.2. Continual improvement 10.2.1. The organization shall maintain an up-to-date and suitable management system. Indicators: the organization has developed a basis for the assessment of the ability of the management system to react to nonconformities in suitable and timely manner and to provide evidence thereof."



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	<p>PEFC EST 1004:2022</p> <p>“4.3 The certification body shall be accredited on the basis of ISO/IEC 17021-1 by a national accreditation body that is a member of the European Co-operation for Accreditation and that complies with the requirements of ISO/IEC 17011 and other documents approved by the IAF.”</p> <p>ISO-IEC 17021-1</p> <p>“4.1.2 The overall aim of certification is to give confidence to all parties that a management system fulfils specified requirements. The value of certification is the degree of public confidence and trust that is established by an impartial and competent assessment by a third-party.</p> <p>4.2.1 Being impartial, and being perceived to be impartial, is necessary for a certification body to deliver certification that provides confidence.”</p> <p>Explanation provided by EFCC</p> <p>“We agree that a certification body (CB) may not participate in the standards approving process. It is extremely important for the EFCC that the CB maintains its independence and impartiality. The clauses of ISO/IEC 17021-1 referred to, provide the requirement of CB's impartiality in carrying out audits, which is very important. Certification bodies have participated in the standard-setting process only as a sharer of their valuable experience in order to identify bottlenecks in the implementation of the standard. It has been ensured by</p>



No.	PEFC benchmark requirement		YES / NO	Reference to system documentation (including quotation of relevant text)												
				<p>the decisions together with the evidence that all certification bodies, including certification bodies who are EFCC members have removed themselves from decision-making with regard to setting up the forest management standard working group, consensus decision-making regarding the forest management standards, as well as approving the standards by the general meeting. All this can be seen in the corresponding protocols. It must be mentioned that before a decision of the general meeting is made, the standard/scheme documents are approved by the EFCC board, which does not include any certification bodies (...) We affirm that although certification bodies have participated in the standard-setting process, they have not participated in consensus decision-making or standard approval process. The entire process has been transparent and impartial.”</p> <p>A11_Minutes of Board Meeting_09.03.2020_Establishment of the SFM WG (translated with Google Translate)</p> <p>“To ensure independence and impartiality, the following members of the working group do not take part in the decision-making of the working group:”</p> <table><tr><td>BM Certification Estonia OÜ</td><td>Ülo Roop</td><td></td></tr><tr><td>NCS Estonia OÜ</td><td>Renal Lastik</td><td>Björn Sild</td></tr><tr><td>SA Eesti Akrediteerimiskeskus</td><td>Eire Endrekson</td><td></td></tr><tr><td>Metrosert AS</td><td>Andres Martma</td><td></td></tr></table> <p><i>BM Certification Estonia OÜ, NCS Estonia OÜ and Metrosert AS are Certification Bodies and SA Eesti Akrediteerimiskeskus is an Accreditation Body.</i></p> <p>A7.1._Minutes of Board Meeting_Approving SFM ST 1003_04.05.22 (translated with Google Translate)</p> <p>“Since the Estonian Forest Certification Scheme contains requirements for certification bodies, BM Certification OÜ cannot take part in the decision on agenda item 2.”</p> <p>A36_Minutes of SFM ST Amendments Final Approving_EFCC_GA 21.06.2022 (translated with Google Translate)</p> <p>“5. Approval of amendments to PEFC Estonian sustainable forest management standard Since the Estonian Forest Certification Scheme contains requirements for certification bodies, BM Certification OÜ cannot take part in the decision on agenda item 5.”</p> <p><i>Impartiality of the certification body is required as per ISO-IEC 17021-1, which is included as normative reference. While it is not explicitly stated in the scheme documentation that third</i></p>	BM Certification Estonia OÜ	Ülo Roop		NCS Estonia OÜ	Renal Lastik	Björn Sild	SA Eesti Akrediteerimiskeskus	Eire Endrekson		Metrosert AS	Andres Martma	
BM Certification Estonia OÜ	Ülo Roop															
NCS Estonia OÜ	Renal Lastik	Björn Sild														
SA Eesti Akrediteerimiskeskus	Eire Endrekson															
Metrosert AS	Andres Martma															

No.	PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
			<i>parties cannot be involved in the standard-setting process as governing or decision making body, the requirement of independence of the certification body is expected to suffice and appears to be well understood and accurately implemented. Evidence for the decision making process was found in several minutes.</i>
2.	Does the scheme documentation require that certification body for forest management certification shall fulfil requirements defined in ISO 17021?	Annex 6, 3.1 YES	PEFC EST 1004:2022 “4.1 The certification body shall comply with the requirements of the standard ISO/IEC 17021-1, relevant IAF documents and this document.”
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 EST 1004:2022 “4.2 The certification body shall have: b) technical competence in forest management and its economic, social and environmental impacts. The professional expertise in forest management and its economic, social and environmental impacts shall be demonstrated on the basis of certification experience in the relevant field and relevant vocational or higher education in forestry and two-year work experience in the field of forestry of the staff;”
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 EST 1004:2022 “4.2 The certification body shall have: a) a good knowledge of the Estonian Forest Certification scheme;”
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 EST 1004:2022 “5.3 Auditors shall have general knowledge of forest management and its economic, social and environmental impacts. The professional expertise in forest management and its environmental impacts shall be demonstrated on the basis of relevant vocational or higher education in forestry and two-year work experience in the field of forestry. 5.4 Auditors shall have knowledge of the certification process and audit requirements and the skills to perform audits.”

No.	PEFC benchmark requirement		YES / NO	Reference to system documentation (including quotation of relevant text)
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 EST 1004:2022 "5.1 Auditors shall fulfil the general criteria for management system auditors defined in ISO 19011."
7.	Does the scheme documentation include additional qualification requirements for auditors carrying out forest management audits? [*1]	Annex 6, 3.2	N.A.	<i>No additional qualification requirements are found.</i>
Certification procedures				
8.	Does the scheme documentation require that certification bodies shall have established internal procedures for forest management certification?	Annex 6, 4	YES	PEFC EST 1004:2022 "4.2 The certification body shall have: c) documented procedures and methods. 6.1.1 The certification process shall consist: a) the auditee shall submit an application to the certification body confirming that he/she complies with all the requirements of the scheme; b) review of the application and the available material by the certification body; d) the first phase of the certification audit (focusing on assessing the documents) and the second phase of the certification audit (in the certification area); e) technical review/decision by the certification body, f) surveillance audits."
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	PEFC EST 1004:2022 "4.3 The certification body shall be accredited on the basis of ISO/IEC 17021-1 by a national accreditation body that is a member of the European Co-operation for Accreditation and that complies with the requirements of ISO/IEC 17011 and other documents approved by the IAF."

No.	PEFC benchmark requirement		YES / NO	Reference to system documentation (including quotation of relevant text)
10.	Does the scheme documentation require that applied auditing procedures shall fulfil or be compatible with the requirements of ISO 19011?	Annex 6, 4	YES	PEFC EST 1004:2022 "6.2.1.1 The applied auditing procedures shall meet the requirements of ISO/IEC 19011."
11.	Does the scheme documentation require that certification body shall inform the relevant PEFC National Governing Body about all issued forest management certificates and changes concerning the validity and scope of these certificates?	Annex 6, 4	YES	PEFC EST 1004:2022 "4.5 The certification body shall have the right to notify EFCC of certification and sign a notification contract with Estonian Forest Certification Council 6.2.1.8 The certification body shall provide EFCC with a summary of the forest certification audit report, including a summary of findings on the conformity with the Estonian forest certification scheme."
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 EST 1004:2022 "6.2.1.2 The auditing criteria shall include (...) PEFC ST 2001:2020 in case the client uses PEFC trademarks."
13.	Does a maximum period for surveillance audits defined by the scheme documentation not exceed more than one year?	Annex 6, 4	YES	PEFC EST 1004:2022 "4.3 The certification body shall be accredited on the basis of ISO/IEC 17021-1 by a national accreditation body that is a member of the European Co-operation for Accreditation and that complies with the requirements of ISO/IEC 17011 and other documents approved by the IAF. 4.9. Surveillance audits shall be conducted during the certificate validity and the period between surveillance audits shall not exceed 12 months."
14.	Does a maximum period for assessment audit not exceed five years for forest management certifications?	Annex 6, 4	YES	PEFC EST 1004:2022 "4.3 The certification body shall be accredited on the basis of ISO/IEC 17021-1 by a national accreditation body that is a member of the European Co-operation for Accreditation and that complies with the requirements of ISO/IEC 17011 and other documents approved by the IAF. 4.8. The certificate is valid for a maximum period of five (5) years."
15.	Does the scheme documentation include requirements for public availability of certification report summaries?	Annex 6, 4	YES	PEFC EST 1004:2022



No.	PEFC benchmark requirement		YES / NO	Reference to system documentation (including quotation of relevant text)
				<p>“6.2.1.8 The certification body shall provide EFCC with a summary of the forest certification audit report, including a summary of findings on the conformity with the Estonian forest certification scheme.</p> <p>Note 1. The summary of the audit report is made available to the public by EFCC at the official website of EFCC or upon request within 14 days.”</p>
16.	Does the scheme documentation include requirements for usage of information from external parties as the audit evidence?	Annex 6, 4	YES	<p>PEFC EST 1004:2022</p> <p>“6.2.1.7 The audit evidence to determine the conformity to the forest management standard shall include relevant information from external parties (e.g government agencies, community groups and other organizations, etc.) as appropriate.</p> <p>The audit shall, amongst other relevant information, include sufficient consultation with external parties to ensure that all relevant issues related to the compliance with the requirements of the standard are identified.”</p>
17.	Does the scheme documentation include additional requirements for certification procedures? [*1]	Annex 6, 4	N.A.	<i>No significant additional requirements are found.</i>
Accreditation procedures				
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	<p>PEFC EST 1004:2022</p> <p>“4.3 The certification body shall be accredited on the basis of ISO/IEC 17021-1 by a national accreditation body that is a member of the European Co-operation for Accreditation and that complies with the requirements of ISO/IEC 17011 and other documents approved by the IAF.”</p>
19.	Does the scheme documentation require that an accredited certificate shall bear an accreditation symbol of the relevant accreditation body?	Annex 6, 5	YES	<p>PEFC EST 1004:2022</p> <p>“4.4 Each issued forest management certificate shall have reference to the accreditation (accreditation symbol or text).”</p>
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	Annex 6, 5	YES	<p>PEFC EST 1004:2022</p> <p>“4.4 The certification body shall be accredited on the basis of ISO/IEC 17021-1 by a national accreditation body that is a member of the European Co-operation for Accreditation and that</p>



No.	PEFC benchmark requirement		YES / NO	Reference to system documentation (including quotation of relevant text)
	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?			complies with the requirements of ISO/IEC 17011 and other documents approved by the IAF."
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 EST 1004:2022 "4.3 The certification body shall be accredited on the basis of ISO/IEC 17021-1 (...)The scope of the accreditation shall include references to the Estonian forest certification scheme (PEFC EST 1002:2022, PEFC 1003:2022 and PEFC 2001:2020). 4.4 The certification body shall conduct the forest management certification within the scope of its valid accreditation."
22.	Does the scheme documentation include a mechanism for PEFC notification of certification bodies?	Annex 6, 6	YES	PEFC EST 1004:2022 "4.5 The certification body shall have the right to notify EFCC of certification and sign a notification contract with Estonian Forest Certification Council. 4.6 The certification body shall provide EFCC with a consent to make the information about the PEFC notification, its contact details and the scope of valid accreditation publicly available and submit the information to EFCC for publishing." <i>Notification procedures are found in PEFC EGD 1006:2022 EFCC Notification of Certification Bodies operating Chain of Custody and Forest Management Certification in Estonia against the requirements of the Estonian Forest Certification Scheme.</i>
23.	Are the procedures for PEFC notification of certification bodies non-discriminatory?	Annex 6, 6	YES	PEFC EGD 1006:2022 "4 Conditions for Estonian Forest Certification Council notification The certification body applying for EFCC notification shall: – be a legal entity; – agree to be listed on the publicly available PEFC Council's Information and Registration System including the certification body's identification data and/or other data as specified by PEFC GD 1008, PEFC Information and Registration System – Data Requirements);



No.	PEFC benchmark requirement		YES / NO	Reference to system documentation (including quotation of relevant text)
				<p>– sign a notification contract with Estonian Forest Certification Council (Appendix 1).</p> <p>a) The certification body applying for the right to be a EFCC notified certification body operating forest management and group forest management certification against the requirements of the Estonian Forest Certification Scheme shall have valid accreditation, issued by an accreditation body with membership within the European Co-operation for Accreditation (EA) or the International Accreditation (IAF). The accreditation shall be issued against ISO/IEC 17021-1 and the scope of the accreditation shall explicitly include the requirements of PEFC EST 1003:2022, PEFC Estonia Sustainable Forest Management, PEFC EST 1002:2022, Group Forest Management Certification and PEFC ST 2001:2020, PEFC Trademarks Rules – Requirements.”</p> <p><i>No discriminatory clauses are found in the procedures for notification.</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 the members of the WG for the Group Forest Management Certification Standard and additional stakeholders that were invited and/or participated in public consultation meetings during the scheme development process.

General

In total 8 stakeholders responded to the request to fill-out the questionnaire:

- 5 respondents who are forest owners
- 1 respondent from a (social) non-governmental organization
- 1 respondent from the scientific and technological community
- 1 respondent from a worker or trade union

The response rate was 8 out of 40 (20%).

Participation in the process

In total 8 respondents participated as a member of the WG for the Forest Management Standard and 2 as member of the WG for the Group Forest Management Certification Standard; 3 respondents participated in both the first (October –December 2021) and second (March –April 2022) public consultation.

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

- 4 respondents indicated the need for adequate consideration of environmental, social and economic aspects
- 3 respondents noted the need for a common understanding/ balance of interests between stakeholders, of which 2 were specifically focused on the representation of issues relevant to the workforce/ private forest owners
- 4 respondents were interested in the further improvement and/or understanding of the standard
- 2 respondents were looking to achieve a simplification of the standard and a reasonable documentation burden
- 1 respondent was in the process of obtaining company certification and therefore wanted to engage in the PEFC process
- 1 respondent wanted to have a say in the process as a group certificate holder
- 1 respondent joined as a teacher, to keep up to date with the latest developments



Respondents only reported a few concerns about the SFM standard:

- 1 respondent was concerned with the lack of understanding of ecological principles and the resulting practical illogicalness
- 1 respondent was concerned that certain aspects of the standard were overemphasized, and that the standard was not balanced enough
- 1 respondent was concerned that the standard would hamper sustainable forest management as a result of too stringent requirements, which small forest owners in particular might struggle to comply with

All respondents that had participated in the standard revision process who had a concern (3), stated that the organizers of the standard revision process had provided them with an opportunity to address their concern, and indicated that everyone had been given the opportunity to voice their concerns. They also noted that proposals from WG members were listened to and considered in the working group. All respondents that were part of the WG 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 8 respondents that participated in the process all relevant stakeholders were actively identified and invited to the process. 7 respondents stated that disadvantaged stakeholders and key stakeholders were proactively invited to the standard development process, while 1 respondent replied 'don't know'.

8 respondents found that the WG had a balanced representation of the various stakeholder groups, whereby 1 respondent stated that the working group was 'very balanced and multi-lateral'.

Most (7) respondents found that the WG had good representation from all areas of Estonia, whereby 1 respondent commented that Estonia is so small that it is difficult to create regional specificities. 1 respondent found that there were regions that were not, or that were poorly represented. This opinion was not further clarified.

Complaints

None of the respondents indicated that there had been a complaint.

Sensitive issues indicated by respondents

None of the respondents indicated that there had been sensitive issues in the assessment. 1 respondent commented that because of the nature of sensitive issues it would be difficult to judge them, but that the WG discussions were open and transparent.



The Working Group

The respondents that had been part of the WG (8) 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 praised the facilitators of the process for the substantive and well-organized meetings, whereas another respondent mentioned the open and transparent character of the WG meetings and stated the process went beyond what was required under the formal procedures.

7 respondents stated that the decision of the WG was taken on the basis of consensus, whereby 1 respondent commented that dissenting views were debated, considered, and clarifications and responses were provided. Only 1 respondent noted one instance in which one of the commenters did not wish to participate in the voting and the reception had to be by ballot.

7 respondents indicated that, in case no consensus was reached, issues were solved by means of negotiations, seeking for common ground and harmonisation of terminology. One respondent commented that there were no issues as discussions always continued until all WG members agreed and a consensus was reached.

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

There were no remarks about sensitive issues.



Stakeholders that were invited for the survey

This survey was received by 40 stakeholders.

Stakeholder group	Organization	Representative	Contact
Forest owners	Eesti Erametsaliit	Kertu Kekk	erametsaliit@erametsaliit.ee
		Kristel Pern	
	RMK	Rainer Laigu	Rainer.laigu@rmk.ee
	Luua Metsanduskool	Peep Arold	veiko.belials@luua.ee
	KÜ Eramets	Priit Jõeäär	Priit.joeaar@metsauhistu.ee
	Eesti Evangeelne Luterlik Kirik	Ants Varblane	varblaneants@gmail.com
	Järvselja Metskond SA		Tanel.Piir@jarvselja.ee
Forest and wood industry	Eesti Metsa- ja Puidutööstuse Liit	Henrik Välja	Henrik.valja@empl.ee
(Business and Industry)	Eesti Puitmajaliit	Lauri Kivil, tegevjuht	lauri@puitmajaliit.ee
	TÜ Eesti Puidumüügikeskus	Einar Rannula, tegevjuht	einar@timbertrade.ee
	Eesti Taastuvenergia Koda	Raul Kirjanen, volinik	koda@taastuvenergeetika.ee
	Eesti Mööblitootjate Liit		info@furnitureindustry.ee
	Eesti Trüki- ja Pakenditööstuse Liit	Katre Savi, juhatuse liige	katre.savi@etpl.ee
Scientific and Technological Community	Tartu Ülikool	Jaan Liira, Koosluste (metsade) loodusliku kvaliteedi, struktuuri ja bioloogilise mitmekesisuse indikaatorid * Metsade kaugseire meetodid	jaan.liira@ut.ee
	Tallinna Tehnikaülikool	Jaan Kers	jaan.kers@ttu.ee
	Eesti Maaülikool	Regino Kask	Regino.kask@emu.ee
Workers and Trade Unions	Eesti Metsateenijate Ühing	Kaarel Tiganik	kaarel.tiganik@rmk.ee
	Eesti Metsatöötajate Ametiühing	Jaan Aiaots (väljastpoolt ekspert)	info@emtay.ee
NGOs	Eesti Looduskaitse Selts	Arvo Veskimets	nature@hot.ee,
		Kalev Tihkan	kalew@velise.ee
	Eesti Metsaselts	Mart Kelk	Mart.kelk@metsaselts.ee
		Liina Gross, tegevjuht	Liina.gross@metsaselts.ee
	Eesti Looduseuurijate Selts (Metsandussektsoon)	Marek Metslaid (asepresident, metsandussektsooni esimees)	marek.metslaid@emu.ee
		https://www.elus.ee/index.php/metsandussektsoon/	



	Eesti Orienteerumisliit	Karli Lambot, juhatusesimees	juhatus@orienteerumine.ee
	Eesti Põllumajandus-Kaubanduskoda (Keskühistu Eramets)	Ülle Läll, Keskühistu Eramets (metsanduse grupi esimees)	ulle.lall@gmail.com
	MTÜ Eesti Keskkonnahariduse Ühing	Juhatusse kuuluvad Jonas Nahkor, Dagmar Hoder, Val Rajasaar, Peep Tobreluts ja Helen Tuusti.	Lille 10, Tartu 51010, ekhyhing@gmail.com
	Arengukoostöö Ümarlaud	Agne Kuimet	agne@terveilm.ee
		tegevjuht, huvikaitse kestliku arengu ja maailmahariduse suunal	
	Organic-Estonia MTÜ	Krista Kulderknap, tegevjuht	info@organicestonia.ee
	Eesti Jahimeeste Selts	Tõnis Korts, tegevjuht	tonis.korts@ejs.ee
	Eesti Keskkonnaühenduste Koda, sh:	EKO eesistuja 2020. aastal on SA Eestimaa Looduse Fond	info@eko.org.ee
Local authorities	Eesti Linnade ja Valdade Liit	Thea Perm (tegevjuht), Bert Rähni	info@loodusturism.com
	Saarde Vald	Veikko Luhaid, tegevdirektor	Veikko.Luhaid@elvl.ee
	MTÜ Väikesaarte Liit	Kadri-Aija Viik (vallavolikogu esimees)	kadri@eestimetsad.ee
		VSL (Kihno, Vormsi, Ruhnu) JUHATUSE LIIKMED, Tanel Viks ja Ingvar Saare	vaikesaarteliit@gmail.com
Other	NCS Estonia OÜ	Renal Lastik, tegevjuht	renal.lastik@ncsgroup.eu
	Metrosert AS	Andres Martma, Sertifitseerimisdivisjoni juht	andres.martma@metrosert.ee
	NepCon	ROMAN POLYACHENKO, Director of NEPCon Estonia and Chain of Custody Programme Manager	rpolyachenko@nepcon.org
	BM Certification Estonia OÜ	CoC/ FM juhtaudiitor: Ülo Roop	ulo.roop@bmtrada.ee
	SA Eesti Akrediteerimiskeskus	Eire Endrekson, MBA, akrediteerimisjuht-üksusejuht	Eire@eak.ee
	Erametsakeskus	Jaanus Aun, juhatusesimees	Jaanus.aun@eramets.ee
	Eesti Metsaüliõpilaste Selts	Juhatus	emeus.emu@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 EFCS? (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, as a member of the Working Group for the Group Forest Management Certification Standard <input type="checkbox"/> Yes, I participated in the first public consultation (October – December 2021) <input type="checkbox"/> Yes, I participated in the second public consultation (March –April 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 EFCS Scheme?	Interest: Click here to enter your comments	Click here to enter your comments

Question to stakeholder	Answer	Explanation / Remark
4. What, if any, was your main concern(s) regarding the Sustainable Forest Management (SFM) standard of the EFCS Scheme?	Concern: Click here to enter your comments	Click here to enter your comments
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 of the Forest Management Standard 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

Question to stakeholder	Answer	Explanation / Remark
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
11. a) Are you aware if any substantive and/or process complaints and appeals relating to the standard revision process were formally submitted to the Estonian Forest Certification Council, 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 EFCS Scheme?	<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
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



Question to stakeholder	Answer	Explanation / Remark
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.

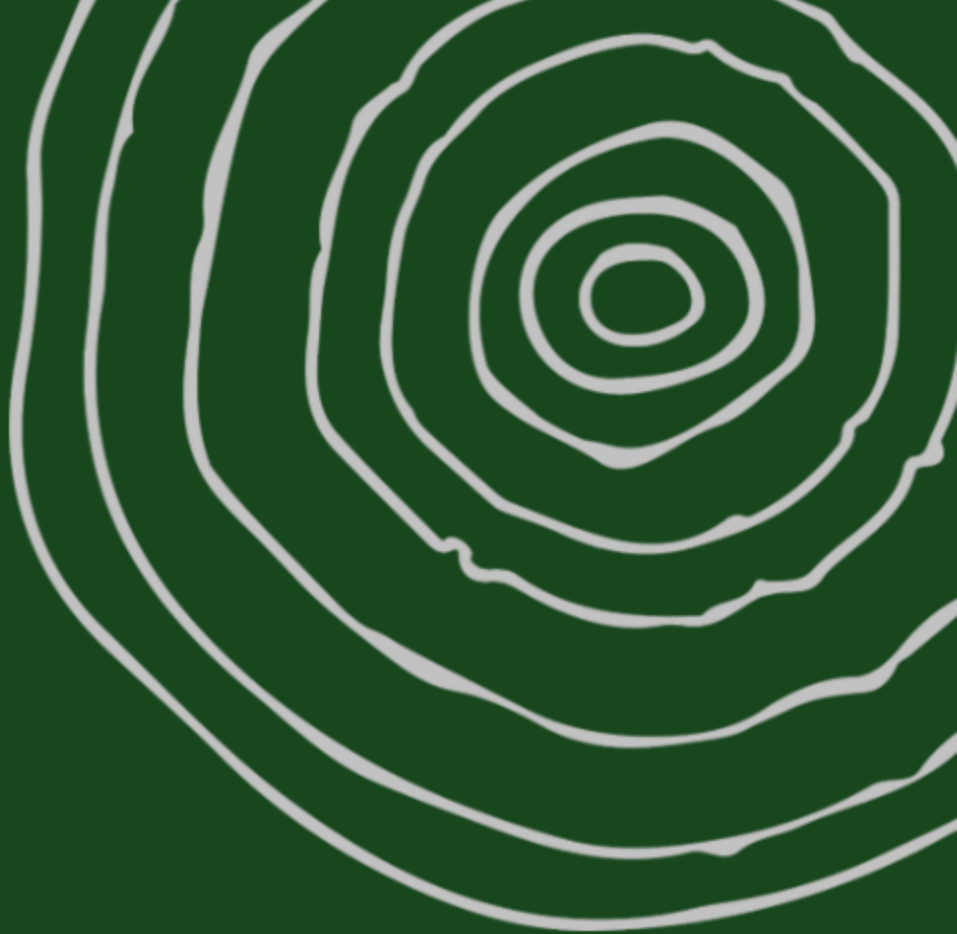
Annex 4 Report on the field assessment

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, p 26.	<p>PEFC EST 1003:2022</p> <p>"8.2.5. The organization shall not take litter into the forest and the spillage of oil and fuel shall be prevented during forest management work. The organization and/or contractor shall have preparedness for the prevention and elimination of the spillage of oil and fuel and littering. The organization shall develop measures for avoiding accidental littering. Inorganic waste and litter are collected and disposed of in an environmentally sustainable manner."</p>	<p>This limits this requirement for forest operations, but this requirement is generally applicable for the certified forest. Please revisit the assessment decision.</p>	<p>Adjusted accordingly.</p> <p>PEFC EST 1003:2022</p> <p>"8.2.5. The organization shall not take litter into the forest and the spillage of oil and fuel shall be prevented during forest management work. The organization and/or contractor shall have preparedness for the prevention and elimination of the spillage of oil and fuel and littering. The organization shall develop measures for avoiding accidental littering. Inorganic waste and litter are collected and disposed of in an environmentally sustainable manner."</p> <p><i>The wording "during forest management work" limits this requirement for forest operations, but the requirement is generally applicable for the certified forest.</i></p>





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