

CK SERVICES

**Assessment of the revised Danish Forest
Certification System against PEFC Sustainability
Benchmark Standards**

FINAL REPORT, 13th February 2022

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1 Introduction

This document is the final report on the assessment of the revised Danish Forest Certification System against PEFC International's Sustainability Benchmark Standards, which was carried out by CK Services.

The assessment was conducted as a desk study following PEFC International's procedures for the assessment of revised forest certification systems, which are defined in PEFC GD 1007:2017, *Endorsement and Mutual Recognition of Certification Systems and their Revision*.

The structure of this report is based on PEFC GD 1007, Appendix 2, *The assessment report*.

1.1 Assessment Scope

The scope of the assessment covers the evaluation of system documentation and reference documentation as submitted by PEFC Denmark against the PEFC International Sustainability Benchmark Standards specified as being applicable for this assessment by PEFC International in a *tender dossier*. In addition, responses to an international stakeholder consultation and a stakeholder involvement survey were taken into consideration.

The system documentation submitted by PEFC Denmark comprises the documents listed in Table 1.

Table 1, System documentation, PEFC Denmark

Document title	Document name
PEFC DK 000-1	The Danish PEFC certification system for sustainable forest management
PEFC DK 001-4	PEFC Denmark's Forest Management Standard
PEFC DK 003-5	Requirements for group certification of sustainable forest management
PEFC ST 2002:2020	Chain of Custody of Forest and Tree Based Products – Requirements
PEFC ST 2001:2020	PEFC Trademarks Rules – Requirements
PEFC ST 2003:2020	Requirements for Certification Bodies Operating Certification against the PEFC International Chain of Custody
DK 005-4	Requirements for certification and accreditation processes
PEFC DK 006-4	Guidance on PEFC notification of certification bodies
PEFC DK 007-3	Terms and definitions
PEFC DK 008-3	Procedures for the development and revision of the Danish PEFC certification system
N/A	Statutes of PEFC Denmark

The following documents were provided by PEFC Denmark supporting the application for assessment and endorsement:

- Application letter PEFC Denmark 2021
- Development report
- Evidence of consensus
- Contact info of stakeholders identified in the stakeholder mapping
- PEFC Checklist - Standard Setting Procedures and Process (PEFC ST 1001:2017)
- PEFC Checklist - Group Forest Management Certification (PEFC ST 1002:2018)
- PEFC Checklist - Sustainable Forest Management (PEFC ST 1003:2018)
- PEFC Checklist - Certification and Accreditation Procedures (Annex 6)

- Sustainable Forest Management (updated checklist after commenting period)
- Group forest management (updated checklist after commenting period)
- Standard setting (updated checklist after commenting period)

The following documents were provided by PEFC Denmark in relation to the standard review and revision process:

- Letters received during public consultation
 - Dansk Skovforening Høring PEFCordning_endeligt
 - DDS høringssvar til PEFC-certificering
 - DN PEFC Danmark høringsvar jan 21
 - Lindenberg - Høringssvar til revisionen af den danske PEFC Standard
 - Naturstyrelsen Høringsskema PEFC 01_02_2021
 - NEPCon - PEFC Høringssvar
 - Orenæs skovdistrikt og Skovselskabet Poulsker ApS
 - Skovdyrkerne høringssvar 31JAN2021
 - First meeting - Referat for 1. møde arbejdsgruppe 1. 18_11_19.
 - First meeting working group 1 and 2 - Fællesmøde PP
 - Invitation to public consultation - Invitation til høring af den 4
 - Invitation to public consultation - Dec 3 2020 - Brev til høring
 - Saved drafts standards
 - Stakeholder maped - Liste over inviterede interessenter
 - Reply public consultation (folder with 11 emails)

The system documentation of PEFC Denmark was assessed against the PEFC International Sustainability Benchmark Standards defined to be applicable for this assessment in PEFC International's *tender dossier*, listed in Table 2.

Table 2, PEFC International Sustainability Benchmark Standards

Document title	Document name
PEFC ST 1001:2017	<i>Standard Setting – Requirements</i>
PEFC ST 1002:2018	<i>Group Forest Management Certification – Requirements</i>
PEFC ST 1003:2018	<i>Sustainable Forest Management – Requirements</i>
Annex 6, PEFC TD	<i>Certification and Accreditation Procedures Forest Management</i>
PEFC ST 2003:2020	<i>Requirements for Certification Bodies operating Certification against the PEFC International Chain of Custody Standard</i>

A detailed evaluation of the system's chain of custody standard and its trademark use rules were not requested to be covered by the scope of this assessment, due to the adoption of the PEFC International Benchmark Standards for chain of custody and trademark use by the Danish Forest Certification System. Procedures for scheme administration, such as for complaint resolution or notification of certification bodies are also not covered by this assessment in detail and are expected to be evaluated by PEFC International internally.

1.2 Methodology

The assessment was carried out as a desk study. A field visit was not part of this assessment, as this is not required by PEFC GD 1007 for previously PEFC endorsed systems, nor had a field visit been explicitly requested by PEFC International or PEFC Denmark.

1.2.1 Assessment of the standard setting procedures and process

The assessment of the Danish Forest Certification System's standard setting procedures and of the standard review and revision process was carried out against PEFC ST 1001:2017. The system documentation assessed consisted of PEFC DK 008-3, *Procedures for the development and revision of the Danish PEFC certification system*. Also considered were PEFC Denmark's development report, the provided reference documentation and responses from an international stakeholder consultation and a stakeholder involvement survey.

The "PEFC Checklist - Standard Setting Procedures and Process (PEFC ST 1001:2017)" as provided by PEFC International was used for this assessment. The completed checklist is found in Annex A of this report. Details on responses to international stakeholder consultation and stakeholder survey can be found in Annex B and Annex C.

1.2.2 Assessment of the forest management standard

The assessment of the Danish Forest Certification System's forest management standard was carried out against PEFC ST 1003:2018. The system documentation assessed consisted of PEFC DK 001-4, *PEFC Denmark's Forest Management Standard*.

The "PEFC Checklist - Sustainable Forest Management (PEFC ST 1003:2018)" as provided by PEFC International was used for this assessment. The completed checklist is found in Annex A of this report.

1.2.3 Assessment of the group certification model

The assessment of the Danish Forest Certification System's group certification model was carried out against PEFC ST 1002:2018. The system documentation assessed consisted of PEFC DK 003-5, *Requirements for group certification of sustainable forest management*.

The "PEFC Checklist - Group Forest Management Certification (PEFC ST 1002:2018)" as provided by PEFC International was used for this assessment. The completed checklist is found in Annex A of this report.

1.2.4 Assessment of the certification and accreditation procedures

The assessment of the Danish Forest Certification System's certification and accreditation procedures for forest management certification was carried out against Annex 6 of the PEFC Technical Document. The system documentation assessed consisted of DK 005-4, *Requirements for certification and accreditation processes*.

The "PEFC Checklist - Certification and Accreditation Procedures (Annex 6, PEFC TD)" as provided by PEFC International was used for this assessment. The completed checklist is found in Annex A of this report.

The Danish Forest Certification System's certification and accreditation procedures for chain of custody certification had not to be assessed in detail, as the system has adopted PEFC ST 2003 as part of its own technical documentation in its original version as published by PEFC International.

1.2.5 Assessment decisions

Based on PEFC GD 1007, 6.2.2, three types of decisions were made with regard to the conformity of the Danish Forest Certification System with the relevant PEFC Benchmark requirements:

a) **Conformity:** The system documentation fully meets a particular PEFC Benchmark requirement.

- b) **Minor nonconformity:** A nonconformity against a specific PEFC Benchmark requirement that has a low impact on achieving the intended outcome of the PEFC International Benchmark Standard. According to PEFC GD 1007, 6.2.3 a minor nonconformity should be corrected within 6 months of a potential endorsement by PEFC. The assessor may recommend a longer period where justified by particular circumstances. Multiple minor nonconformities can result in a recommendation that minor nonconformities shall be corrected before the endorsement of the applicant system.
- c) **Major nonconformity:** A nonconformity against a specific PEFC Benchmark requirement that has a high impact on achieving the intended outcome of the PEFC International Benchmark Standard. According to PEFC GD 1007, 6.2.3 a major nonconformity does not allow the PEFC endorsement of a system and needs to be corrected before an endorsement can take place.

1.3 Assessment Process

1.3.1 Assessment schedule

The assessment process followed a schedule based on PEFC GD 1007. The dates for the individual steps of the assessment had been agreed between PEFC Denmark, PEFC International and CK Services prior to the start of the assessment. The assessment schedule was adjusted due to a one week delay in delivery of the draft report, an extension of the commenting period for PEFC Denmark by a month to respond to the findings of the draft report and a delayed start of the internal review by PEFC International due leave at the end of the year 2021. The assessment process is shown in Table 3.

Table 3, Assessment process

Assessment event	Date	By
Int. stakeholder consultation	5 th July – 2 nd September 2021	PEFC International
Assessment start	6 th September 2021	CK Services
Stakeholder survey	10 th – 23 rd September 2021	CK Services
Draft assessment report	1 st October 2021	CK Services
Commenting period	By 8 th December 2021	PEFC Denmark
Final draft assessment report	10 th January 2022	CK Services
Internal Review	2 nd February 2022	PEFC International
Final report	13 th February 2022	CK Services

1.3.2 Assessment steps

The assessment consisted of the following steps:

a) **Public consultation**

An international public stakeholder consultation organized by PEFC International was held from 5th July until 2nd September 2021. PEFC informed CK Services on 2nd September 2021 that no comments had been received during this consultation (see Annex C).

A stakeholder involvement survey on national level was organized by CK Services. On 10th September 2021 invitations to respond to an online questionnaire were sent to 61 stakeholders by email. The survey was accessible to stakeholders until 23rd September 2021. Three stakeholders responded to the survey and their feedback was taken into account for the preparation of the draft report (see Annex B).

b) Desk study and preparation of draft assessment report

The initial desk study took place during the period 6th September to 1st October 2021. It comprised an evaluation of the submitted system documentation against the relevant PEFC International Benchmark Standards covered by the scope of the assessment, as well as a consideration of PEFC Denmark's development report, the provided reference documentation, and the responses to international stakeholder consultation and stakeholder involvement survey.

c) Commenting period

The commenting period during which PEFC Denmark could respond to the findings of the draft report was extended by over a month and lasted from 4th October 2021 8th December 2021.

d) Preparation of final draft assessment report

The responses to the draft report and changes made to the system by PEFC Denmark to the system during the commenting period were considered by CK Services in the preparation of a final draft report during the period 8th December 2021 until 10th January 2022.

e) PEFC International internal review

The Internal Review by PEFC International started on 10th January 2022 and ended on 2nd February 2022.

f) Preparation of the final assessment report.

The final report was submitted to PEFC International on 13th February 2022.

1.4 Assessment Personnel

The assessment was carried out by Mr. Christian Kämmer at CK Services. Contact person at PEFC International was Mr. Hubert Inhaizer. Contact person at PEFC Denmark was Mr. Sune Enevoldsen.

2 Recommendation

To maintain the endorsement of the revised Danish PEFC System, on the condition that PEFC Denmark addresses the eleven minor nonconformities identified in the system's standard setting procedures¹, FM standard² and group certification requirements³ as well as the two comments on references to relevant legislation⁴ and provides a plan on how to avoid the two nonconformities identified in the standard revision process being repeated in the next standard revision, all within six months as of the communication of maintained endorsement by the PEFC Council.

¹ PEFC ST 1001:2017, 6.4.6 (definition of a threshold quantifying consensus)

² PEFC ST 1003:2018: 4.1e) (specification of 100% PEFC certified claim), 8.1.6a)-h) (conversion of degraded forests); 8.2.8 (prohibition of WHO Class 1A & B pesticides); 8.2.9 (prohibition of chlorinated hydrocarbons); 9.1.4 (monitoring of working conditions) and 9.2.2c) (objectivity/impartiality of internal auditors)

³ PEFC ST 1002:2018, 5.2.1a) (commitment by group entity to comply with certification system requirements) 5.2.1b) (commitment by group entity to integrate group certification requirements into its management system), and 5.2.2 (public availability of group entity's commitment) and 9.3.1.3 (pre-existing groups as group participants)

⁴ PEFC ST 1003:2018, 6.3.1.3 (reference to anti-corruption legislation) and PEFC ST 1003:2018, 6.3.1.4 (reference to legislation concerning unauthorized activities in forests, such as illegal logging, illegal land use, illegally initiated fires, and other illegal activities)

3 Summary of findings

3.1 Overall

The assessment of the revised Danish Forest Certification System and its revision process against the PEFC International Benchmark Standards covered under the scope of this assessment has identified 13 minor nonconformities with PEFC International requirements in the system's standard setting procedures, standard setting process, forest management standard and group forest management requirements.

Once corrective action has been successfully taken to resolve the nonconformities in the technical documents of the revised Danish system, they can be considered as being fully in line with PEFC International's Sustainability Benchmarks.

3.2 Structure of the System

The structure of the system is defined in PEFC DK 000-1, *The Danish PEFC certification system for sustainable forest management*, PEFC Denmark's Statutes and PEFC DK 003-5, *Requirements for group certification of sustainable forest management*.

No aspects of the system's structure that would inhibit its functioning as a PEFC endorsed forest certification system have been identified in the assessment.

3.3 Standard Setting Procedures

In the assessment of the standard setting procedures of the revised Danish Forest Certification System defined in PEFC DK 008-3, *Procedures for the development and revision of the Danish PEFC certification system*, one minor nonconformity has been identified. The system's revised standard setting procedures can therefore be considered as meeting the PEFC International Benchmark Standard, PEFC ST 1001:2017 once corrective action on the minor nonconformity has been successfully taken.

3.4 Standard Setting Process

Two minor nonconformities were identified in the standard revision process. The revision process can therefore be considered as having been very robust in terms of conformity with PEFC ST 1001:2017.

3.5 Forest Management Standard

In the assessment of the forest management standard of the revised Danish Forest Certification System, PEFC DK 001-4, *PEFC Denmark's Forest Management Standard*, six minor nonconformities have been identified in the updated standard provided by PEFC Denmark after the extended commenting period. The revised standard can be considered as being in conformity with PEFC ST 1003:2018 once corrective action on the six minor nonconformities has been successfully taken.

3.6 Group Certification Model

The requirements for group forest management certification of the revised Danish Forest Certification System are defined in PEFC DK 003-5, *Requirements for group certification of*

sustainable forest management. In the assessment four minor nonconformities were identified. The system therefore meets PEFC International's requirements for group forest management certification, PEFC ST 1002:2018 once corrective action on the four minor nonconformities has been successfully taken.

3.7 Chain of Custody Standard and Trademark Use

The Danish Forest Certification System has adopted PEFC International's chain of custody standard, PEFC ST 2002:2020, and trademark rules, PEFC ST 2001:2020, as normative elements of its system documentation in their original version as published by PEFC International. The system therefore meets PEFC International's requirements for chain of custody standards and PEFC trademark rules.

3.8 Certification and Accreditation Procedures

PEFC Denmark has adopted PEFC ST 2003:2020 in its original version as published by PEFC International. The system therefore meets PEFC International's requirements on certification and accreditation procedures for chain of custody certification.

The Danish Forest Certification System's requirements for certification bodies conducting forest management defined in DK 005-4, *Requirements for certification and accreditation processes* meet the requirements of Annex 6, PEFC TD. No nonconformities were identified in the assessment.

3.9 Other Aspects

No comments were submitted in the 60-day public international stakeholder consultation organised by PEFC International.

Feedback received from three out of 61 stakeholders in Denmark invited by CK Services to participate in a stakeholder involvement survey largely confirmed the information provided by PEFC Denmark on the standard review and revision process.

4 Structure of the System

The role of organisations involved as actors in the system, the structure of the system's technical documentation and the basic elements of the system are defined in PEFC DK 000-1, *The Danish PEFC certification system for sustainable forest management*, PEFC Denmark's Statutes, and PEFC DK 003-5, *Requirements for group certification of sustainable forest management*.

4.1 Organisational structure

Table 4 provides an overview about entities and their functions in the Danish Forest Certification System.

Table 4, Entities and their functions in the Danish Forest Certification System

Body	Function	Reference document
PEFC Denmark's Members	Organisations, companies and other interested parties with interest in promoting the objective of PEFC Denmark	Statutes
PEFC Denmark's General assembly	The highest decision-making body of PEFC Denmark, consisting of its members	Statutes
Board of directors	Tasked with the management of PEFC Denmark	Statutes
PEFC Denmark's Secretariat	Tasked with the day-to-day management of PEFC Denmark on behalf of the Board.	PEFC DK 000-1
Accreditation bodies	Accreditation bodies meeting the system's requirements for PEFC certification are defined as body for the accreditation of certification bodies	PEFC DK 000-1
Certification bodies	Independent, accredited certification bodies are defined as bodies responsible for assessing the conformity of entities with the system's certification requirements	PEFC DK 000-1
Group leaders (in forest management certification)	Responsible for implementing a group management system for a group of forest owners and forest owner associations, meeting the system's requirements	PEFC DK 000-1
Group members (in forest management certification)	Forest owners that have signed a written agreement with a group leader on participation in a group certification, implementing the system's forest management requirements	PEFC DK 003-5
Individual forest owners	Forest owners certified against and implementing the system's forest management standard individually	PEFC DK 000-1

The role of entities in chain of custody certification is not further highlighted, as the system has adopted PEFC ST 2002:2020 and PEFC ST 2003:2020 without modification.

4.2 Structure of technical documentation

The system's technical documentation consists of *descriptive*, *normative* and *organisational* documents. An overview of the technical documentation specified in PEFC DK 000-1, *The Danish PEFC certification system for sustainable forest management* is provided in Table 5.

Table 5, Overview of the system's technical documentation

Document Title	Document name
Descriptive documents	
PEFC DK 000-1	The Danish PEFC certification system for sustainable forest management
Normative documents	
PEFC DK 000-1	The Danish PEFC certification system for sustainable forest management
PEFC DK 001-4	PEFC Denmark's Forest Management Standard
PEFC DK 003-5	Requirements for group certification of sustainable forest management
PEFC ST 2002:2020	Chain of Custody of Forest and Tree Based Products – Requirements
PEFC ST 2001:2020	PEFC Trademarks Rules – Requirements
PEFC ST 2003:2020	Requirements for Certification Bodies Operating Certification against the PEFC International Chain of Custody
DK 005-4	Requirements for certification and accreditation processes
PEFC DK 006-4	Guidance on PEFC notification of certification bodies
PEFC DK 007-3	Terms and definitions
Organisational documents	
PEFC DK 008-3	Procedures for the development and revision of the Danish PEFC certification system
N/A	Statutes of PEFC Denmark

4.3 Assessment result

PEFC International defines no specific requirements for the structure of a system against which an assessment could be carried out in detail. However, no aspects of the system's structure that would inhibit its functioning as a PEFC endorsed forest certification system have been identified in the assessment.

5 Standard setting procedures

5.1 Analysis and conclusion

The standard setting/revision procedures for the forest management standard of the Danish Forest Certification System are defined in PEFC DK 008-3, *Procedures for the development and revision of the Danish PEFC certification system*. The scope of PEFC DK 008-3 covers the "standards" of PEFC Denmark, i.e. all normative documents of its system documentation.

The standard setting and revision procedures of the system were revised by PEFC Denmark in 2018 with the aim to align them with the requirements of the latest version of PEFC International's Benchmark Standard for standard setting and revision, PEFC ST 1001:2017. The revised DK 008 was approved by PEFC Denmark on 30th August 2018. The subsequent revision of the forest management standard followed these revised procedures.

In the assessment of PEFC DK 008-3 against PEFC ST 1001:2017 one minor nonconformity was identified.

The single remaining minor nonconformity concerns 6.4.6 of PEFC ST 1001:2017, which requires the definition of a threshold quantifying consensus in standard setting.

Due to only a single minor nonconformity having been identified, the system's revised standard setting procedures can be considered as meeting the PEFC International Benchmark Standard, PEFC ST 1001:2017 once corrective action on the minor nonconformity has been successfully taken..

5.2 Assessment result – Nonconformities

For details on the minor nonconformity with PEFC ST 1002:2018, 6.4.6 identified in the revision procedures, see Table 6, **Nonconformity with PEFC ST 1001, 6.4.6**.

Table 6, Nonconformity with PEFC ST 1001, 6.4.6

<p>PEFC benchmark requirement</p> <p>PEFC ST 1001, 6.4.6: "Where a vote is used in decision-making, the standard-setting procedures shall determine and include decision-making thresholds that quantifies consensus. The threshold must be consistent with the consensus definition (refer to 3.1). However, a majority vote cannot override sustained opposition in order to achieve consensus."</p>
<p>Reference to system documentation (including quotation of relevant text)</p> <p>PEFC DK 008-3, 6: "(...) Consensus must be reached on the content of the final drafts from the working group before they can be approved by the PEFC Denmark board.</p> <p>Consensus does not require unanimity, but according to the PEFC Council's definition of consensus (section 3.1 of PEFC ST 1001:2018), there must be no sustained opposition to significant issues from essential stakeholders; and the process must seek to take into account the views of all parties, as well as attempting to resolve potential conflicts. 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. However, a majority vote cannot override sustained opposition in order to achieve consensus."</p>
<p>Assessment decision: Minor nonconformity</p>
<p>Justification: The benchmark requires that a threshold for consensus is defined by the "standard setting procedures", i.e., by DK 008-3. However, such a threshold does not seem to be defined by DK 008-3.</p>

6 Standard setting process

The recent major revision of the Danish Forest Certification System began in 2018 with the revision of its standard setting procedures and continued from July 2019 onward to March 2021, with a focus mainly on the forest management standard, but also on group certification requirements. The revision aimed to meet the requirements of PEFC ST 1001:2017, *Standard Setting – Requirements* through implementation of PEFC Denmark's revised standard development procedures in the revision process.

During the revision process major changes were made to the system's standard revision procedures, its forest management standard and its group certification standard in order to align them with the latest PEFC International Benchmark Standards.

As the scope of PEFC ST 1001:2017 applies to the standard setting and revision of forest management and chain of custody standards, and as the system has adopted the PEFC International chain of custody standard without modification, only the revision process for the system's forest management standard is covered by this assessment in detail.

6.1 Revision process overview

An overview on the major steps in the revision of the Danish Forest Certification System's forest management standard under PEFC Denmark's revision working group 1 is provided in Table 7. The table was taken from PEFC Denmark's development report without amendments of the content.

Table 7, Major steps in the revision process

Date	Type	Description
8 th July 2019	Publication of startup	Public invitation to participate in the revision work
8 th Aug 2019	Invitation to attend a meeting	Letter sent to relevant stakeholder
17 th Sep 2019	Joint meeting	The first meeting for working groups 1 and 2, introduction to the revision
15 th Jan 2020	2: Working group 1	Presentation of draft 1 of the Forest Management Standard and presentation of Trees Outside the Forest (Træer udenfor Skoven, TuS), as well as approval of future process
19 th Feb 2020	3: Working group 1	Review of relevant requirements and wordings
13 th May 2020	4: Working group 1	Summary review, status of subgroups and presentation of new wordings
26 th May 2020	5: Working group 1	Presentation of a new draft of the Forest Management Standard and planning of new dates for meetings
26 th Aug 2020	6: Working group 1	Consensus on the subgroups and drafts of items after the last meeting
17 th Nov 2020	7: Working group 1	Presentation of consensus for a new Forest Management Standards and proposal for the inclusion of Christmas trees
25 th Nov 2021	Board meeting	The board approves the draft for consultation
3 rd Dec 2021	Start of consultation	All documents are published at www.pefc.dk
2 nd Dec 2020 – 1 st Feb 2021	Receipt of consultation responses	Acknowledgement of all consultation responses is sent to the senders by email
13 th Jan 2021	Open seminar	An online public seminar is held involving review of the drafts
1 st Feb 2021	Consultation completed	Consultation is concluded
1 st Feb – 1 st Mar 2021	Working group 2	The working group reviews consultation responses by email
4 th Feb 2021	8: Working group 1	The working group is presented with the incoming consultation responses. The working group works on consultation responses until the next meeting
1 st Mar 2021	9: Working group 1	The presentation and response to the consultation responses are reviewed. The working group has a consensus on final drafts
5 th March 2021	Board meeting	Approval of draft for the Danish PEFC system.
10 th June 2021	Application to PEFC Int	An official application was sent to PEFC International

6.2 Documentation and evidence

PEFC Denmark submitted a well-structured and detailed development report providing information on the standard revision process. The development report was supported by evidence in the form of additional reference documentation, such as minutes, stakeholder comments, letters, links to announcements and documentation online, an overview of identified and contacted stakeholders and evidence of consensus. Several additional documents were provided as evidence at the end of the commenting period in order to address nonconformities identified in the first draft assessment report.

6.3 Stakeholder involvement survey

On 10th September 2021 CK Services sent an email to 61 stakeholders from the stakeholder list provided by PEFC Denmark as part of the submitted documentation, inviting them to participate in a stakeholder survey consisting out of eight questions regarding stakeholders' involvement in the standard setting process by email. These 61 stakeholders had been identified by PEFC Denmark during a stakeholder mapping exercise carried out at the beginning of the revision process.

The stakeholders were invited to respond to the survey via "SurveyMonkey.com", an online survey tool, by 23rd September 2021.

Only three survey responses were received. Two of the respondents predominantly confirmed the information provided by PEFC Denmark on the revision process. One stakeholder, who decided to respond to the survey anonymously and could therefore not be contacted by CK Services, denied having received any information on and invitation to the revision process.

Details on questions of and answers to the stakeholder involvement survey conducted by CK Services can be found in Table 19 in Annex B of this assessment report.

6.4 Analysis and conclusion

Having assessed the documentation and evidence provided by PEFC Denmark on the standard revision process and considering the outcome of the stakeholder involvement survey, it could be determined that the revision process was predominantly in conformity with the requirements of PEFC ST 1001:2017.

Through the provision of information and evidence by PEFC Denmark in the commenting period of the assessment, the amount of remaining minor nonconformities identified in the standard setting process could be reduced to two. These two nonconformities are related to PEFC ST 1001:2017, 6.2.3 (identification and resolution of constraints for key/disadvantaged stakeholders to participate in standard setting) and 6.3.1e) (invitation to stakeholders to comment on standard setting process and scope).

Due to the limited number of nonconformities identified, the revision process can be considered as having been very robust in terms of conformity with PEFC ST 1001:2017.

6.5 Assessment result – Nonconformities

For details on the minor nonconformity with PEFC ST 1001:2017, 6.2.3 identified in the revision process, see the table below.

Table 8, Minor nonconformity with PEFC ST 1001:2017, 6.2.3

<p>PEFC benchmark requirement</p> <p>PEFC ST 1001, 6.2.3 The standardising body 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>
<p>Reference to system documentation (including quotation of relevant text)</p> <p>PEFC Denmark carried out a stakeholder mapping at the beginning of the revision process, which identified stakeholder groups, key stakeholders, key issues and contact details.</p> <p>Evidence: "Stakeholder mapped - Liste over inviterede interessenter"</p>
<p>Assessment decision: Minor nonconformity</p>
<p>Justification: It is not evident from the documentation provided that any potential constraints for the participation of key and disadvantaged stakeholders were identified and addressed, if necessary.</p>

For details on the minor nonconformity with PEFC ST 1001:2017, 6.3.1e) identified in the revision process, see the table below.

Table, Minor nonconformity with PEFC ST 1001:2017, 6.3.1e

<p>PEFC benchmark requirement</p> <p>PEFC ST 1001, 6.3.1e) The announcement and invitation shall include: (...) explicit invitation and clear instruction on how to submit feedback on the scope and standard-setting process</p>
<p>Reference to system documentation (including quotation of relevant text)</p> <p>PEFC Denmark comment: "See: https://www.pefc.dk/nyheder/offentlig-horing-af-pefc-danmarks-system</p> <p>See box, where it is described how to submit and a instruction document was made if any stakeholders would like to use it: "Indsend høringssvar - Alle høringssvar bedes sendes til PEFC Danmark på info@pefc.dk. Efter modtagelsen vil PEFC Danmark kvittere for modtagelsen. Modtager du ikke en kvittering inden 14 dage, så kontakt PEFC Danmark, Morten Thorøe, på 60 60 56 49 eller mt@pefc.dk.</p> <p>Høringssvar kan også sendes til PEFC Danmark kontor på adressen: PEFC Danmark, Sdr. Tingvej 10, 6630 Rødding</p> <p>Vi opfordrer alle til at bruge følgende skema til at indsende deres høringsvar - Hent dokumentet her."</p>
<p>Assessment decision: Minor nonconformity</p>
<p>Justification: The announcement of the revision process did not include an explicit invitation and clear instruction on how to submit feedback on the scope and standard-setting process. The evidence provided by PEFC Denmark after the commenting period refers to the announcement of the public consultation on the enquiry drafts of revised system documentation at the end of the revision process, not the invitation to participate in the revision process at the start of the revision process, as required. by this benchmark.</p>

7 Forest Management Standard

7.1 Analysis and conclusion

The revised forest management requirements of the Danish Forest Certification System are defined in PEFC DK 001-4.

The previous version of PEFC DK 001 had been endorsed by the PEFC Council in 2013 as meeting the requirements of its PEFC International Benchmark Standard for sustainable forest management published in 2010, PEFC ST 1003:2010.

The revision of PEFC DK 001 that took place 2019-2021 focused mainly on aligning the standard with the new and revised requirements of PEFC ST 2001:2018, which became PEFC International's Benchmark Standard for sustainable forest management in 2018. Additional aims in the revision were to consider feedback from stakeholders, to incorporate experience gained since the last revision and to adapt the standard to current conditions.

The structure of PEFC DK 001 was not significantly amended during the revision process. The most significant change is constituted by the introduction of a new section with criteria and indicators related to mitigation of and adaptation to climate change.

In the assessment of the forest management standard of the revised Danish Forest Certification System, PEFC DK 001-4, *PEFC Denmark's Forest Management Standard*, six minor nonconformities were identified in the updated standard provided by PEFC Denmark after the extended commenting period.

These nonconformities concern the following benchmark requirements of PEFC ST 1003:2018: 4.1e) (specification of 100% PEFC certified claim), 8.1.6a)-h) (conversion of degraded forests); 8.2.8 (prohibition of WHO Class 1A & B pesticides); 8.2.9 (prohibition of chlorinated hydrocarbons); 9.1.4 (monitoring of working conditions) and 9.2.2c) (objectivity/impartiality of internal auditors).

In addition, it was determined that references to the specific Danish legislation addressing corruption (PEFC ST 1003:2018, 6.3.1.3) and unauthorized activities in forests, such as illegal logging, illegal land use, illegally initiated fires, and other illegal activities (PEFC ST 1003:2018, 6.3.1.4) should be added in Annex 1 of DK 001-4. The revised forest management standard of PEFC Denmark can be considered as being in conformity with PEFC ST 1003:2018 once corrective action on the six minor nonconformities has been successfully taken..

7.2 Assessment result – Nonconformities

For details on the minor nonconformity with PEFC ST 1003:2018, 4.1 General, e) see the table below.

Table 9, Minor nonconformity with PEFC ST 1003:2018, 4.1 General, e)

PEFC benchmark requirement
PEFC ST 1003, 4.1 General, e): The requirements for sustainable forest management defined by regional, national or sub-national forest management standards shall: (...) 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 .

<p>Reference to system documentation (including quotation of relevant text)</p> <p>PEFC DK 001-4, 5.7: "If products from the forest are sold as certified, the following information as a minimum must be provided by invoice, delivery note or log tally for each delivery: (...) Certificate number, any PEFC trademark and a "100% PEFC-certified" declaration or other relevant statement"</p>
<p>Assessment decision: Minor nonconformity</p>
<p>Justification: The SFM standard of PEFC Denmark specifies that the claim "100% PEFC certified" is used to communicate the origin of products in an area covered by the standard. However, it is not clear what is referred to with "or other relevant statement". Furthermore, PEFC DK 001-4, 1.5 states that "The products from the intensively managed areas cannot be sold as PEFC-certified unless specified otherwise." It is unclear what "unless specified otherwise" entails. Therefore, there is a risk that undetermined claims other than "100% PEFC certified" are used and that material which does not qualify for a PEFC claim is covered by a PEFC claim. Hence, the benchmark requirement cannot be considered as sufficiently addressed yet.</p>

For details on the minor nonconformity with PEFC ST 1003:2018, 8.1.6a)-h) see Table 10.

Table 10, Minor nonconformity with PEFC ST 1003:2018, 8.1.6a)-h)

<p>PEFC benchmark requirement</p> <p>PEFC ST 1003, 8.1.6:</p> <p>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:</p> <ul style="list-style-type: none"> 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 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 c) has a positive impact on long-term carbon sequestration capacity of forest vegetation; and d) does not have negative impacts on ecologically important forest areas, culturally and socially significant areas, or other protected areas; and e) safeguards protective functions of forests for society and other regulating or supporting ecosystem services; and f) safeguards socio-economic functions of forests, including the recreational function and aesthetic values of forests and other cultural services; and g) has a land history providing evidence that the degradation is not the consequence of deliberate poor forest management practices; and h) is based on credible evidence demonstrating that the area is neither recovered nor in the process of recovery.
<p>Reference to system documentation (including quotation of relevant text)</p> <p>Comment by PEFC Denmark: "Conversion of severely degraded forests to forest plantations is not possible by the Forestry Act."</p> <p>The Forestry Act - Chapter 4:</p> <p>"§ 26. Oak shrubs worthy of preservation shall be preserved as oak shrubs. The Minister for the Environment and Food must register oak scrub worthy of preservation and may, on this basis, enter</p>

into agreements with the owners to ensure their preservation.

§ 27. External forest edges of deciduous trees and shrubs on peace forest areas must be preserved.

§ 28. Lakes, bogs, heaths, salt marshes or beach marshes, fresh meadows and biological pastures belonging to the peace forest and which are not covered by the Nature Conservation Act § 3, because they are smaller than the size limits stipulated therein, may not be cultivated, dewatered, planted or otherwise altered.

PCS. 2. The prohibition in para. 1 also applies to watercourses which are not covered by section 3 of the Nature Conservation Act because they have not been designated as protected by the Minister of the Environment and Food on the recommendation of the municipal council. However, the ban does not apply to usual maintenance work in watercourses.”

<https://www.retsinformation.dk/eli/lta/2019/315>”

Assessment decision: Minor nonconformity

Justification: Without the provision of additional information/explanation by PEFC Denmark it is not clear in the view of the assessor, how the referenced legislation addresses the conversion of “degraded forests”.

Comment: The definition of the term “degraded forest” in the standard referring to relevant legislation may be worth considering.

For details on the minor nonconformity with PEFC ST 1003:2018, 8.2.8 see Table 11.

Table 11, Minor nonconformity with PEFC ST 1003:2018, 8.2.8

PEFC benchmark requirement

PEFC ST 1003, 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.

Reference to system documentation (including quotation of relevant text)

PEFC Denmark comment: “In denmark the regulation for allowed pesticides is regulated by a ”positive list” where any pesticied not mentiond by this list is banned.

<https://mst.dk/service/publikationer/publikationsarkiv/2010/jul/listen-over-uoenskede-stoffer-2009/>

<https://middeldatabasen.dk/currentBannedProducts.asp>

<https://middeldatabasen.dk/positiveList.asp>

In Denmark there is requirements for training and authorization regarding pesticides approved for professional use as they may only be purchased and used by professional users who have completed the necessary training and who have the necessary authorization in the Danish Environmental Protection Agency's authorization system for the use of pesticides - MAB. This applies whether you are spraying on a golf course, on the municipal sidewalks, in a field, in a greenhouse, in the woods or anywhere else. (<https://mst.dk/kemi/pesticider/anvendelse-af-pesticider/brugere-professionel-brug/uddannelse-og-autorisation/krav-om-uddannelse-og-autorisation/>)”

Assessment decision: Minor nonconformity
Justification: From the information provided by PEFC Denmark, it is not clear to the assessor, if any WHO Class 1A and 1B pesticides and other highly toxic pesticides are currently on the referenced “positive list” or not or might be so in future. If PEFC Denmark cannot provide evidence on this, then this prohibition required by the benchmark would need to be assured though PEFC Denmark’s own system.

For details on the minor nonconformity with PEFC ST 1003:2018, 8.2.9 see Table 12.

Table 12, Minor nonconformity with PEFC ST 1003:2018, 8.2.9

PEFC benchmark requirement
PEFC ST 1003, 8.2.9 The standard requires that pesticides, such as chlorinated hydrocarbons whose derivatives remain biologically active and accumulate in the food chain beyond their intended use, and any pesticides banned by international agreement, shall be prohibited. Note: “Pesticides banned by international agreements” are defined in the Stockholm Convention on Persistent Organic Pollutants.
Reference to system documentation (including quotation of relevant text)
<p>PEFC Denmark comment: “In denmark the regulation for allowed pesticides is regulated by a ”positive list” where any pesticied not mentiond by this list is banned.</p> <p>https://mst.dk/service/publikationer/publikationsarkiv/2010/jul/listen-over-uoenskede-stoffer-2009/</p> <p>https://middeldatabasen.dk/currentBannedProducts.asp</p> <p>https://middeldatabasen.dk/positiveList.asp</p> <p>In Denmark there is requirements for training and authorization regarding pesticides approved for professional use as they may only be purchased and used by professional users who have completed the necessary training and who have the necessary authorization in the Danish Environmental Protection Agency's authorization system for the use of pesticides - MAB. This applies whether you are spraying on a golf course, on the municipal sidewalks, in a field, in a greenhouse, in the woods or anywhere else. (https://mst.dk/kemi/pesticider/anvendelse-af-pesticider/brugere-professionel-brug/uddannelse-og-autorisation/krav-om-uddannelse-og-autorisation/)”</p>
Assessment decision: Minor nonconformity
Justification: From the information provided by PEFC Denmark, it is not clear to the assessor, if any pesticides such as chlorinated hydrocarbons whose derivatives remain biologically active and accumulate in the food chain beyond their intended use, and any pesticides banned by international agreement are currently on the referenced “positive list” or not or might be so in future. If PEFC Denmark cannot provide evidence on this, then this prohibition required by the benchmark would need to be assured though PEFC Denmark’s own system.

For details on the minor nonconformity with PEFC ST 1003:2018, 9.1.4 see Table 13.

Table 13, Minor nonconformity with PEFC ST 1003:2018, 9.1.4

<p>PEFC benchmark requirement</p> <p>PEFC ST 1003, 9.1.4 The standard requires that working conditions shall be regularly monitored and adapted as necessary.</p>
<p>Reference to system documentation (including quotation of relevant text)</p> <p>PEFC DK 001-4, 4.6: “The forest owner shall regularly ensure that employees have the necessary instructions or qualifications to perform their duties in a safe and qualified manner and comply with the applicable forest management guidelines as well as legislation, including health and safety legislation. The forest owner can also use contracts to ensure that the contractor is able to document this. The forest owner must regularly ensure that employees receive the necessary further training in relation to the implementation of sustainable management.”</p>
<p>Assessment decision: Minor nonconformity</p>
<p>Justification: The standard does not require that working conditions shall be regularly monitored and adapted as necessary. Instructions, qualifications, contractual agreements, training and documentation alone are not sufficient means of monitoring actual working conditions in the field, in the view of the assessor.</p>

For details on the minor nonconformity with PEFC ST 1003:2018, 9.2.2c see Table 14.

Table 14, Minor nonconformity with PEFC ST 1003:2018, 9.2.2c

<p>PEFC benchmark requirement</p> <p>PEFC ST 1003, 9.2.2 Organisation The standard requires that the organisation shall: (...) c) select the auditors and conduct audits to ensure objectivity and the impartiality of the audit process;</p>
<p>PEFC DK 001-4, 5.1: “Management objectives - The forest owner shall define an objective for sustainable forest management that is compliant with the standard and that relates to management opportunities and limitations given the size and extent of forest management. The forest owner shall conduct internal audits at least once a year to make it likely to meet the requirements of PEFC Denmark’s Forest Management Standard – PEFC DK 001-4 and that they are effectively implemented and maintained.</p> <p>The objective shall include:</p> <ul style="list-style-type: none"> • An overall objective for the forest property • All relevant objectives, goals and targets for forest management <p>The internal audit shall include:</p> <ul style="list-style-type: none"> • The frequency, methods used and responsibilities, • Definition of the audit criteria and scope for each audit; • Selection of auditor • That results are reported to relevant management • That documentation is retained as evidence of the implementation of the audit programme and the audit results”
<p>Assessment decision: Minor nonconformity</p>
<p>Justification: Objectivity and impartiality of internal auditors are not addressed by the standard. It is understood that this can be difficult to meet in very small organisations, but it should be at least</p>

attempted to be addressed for the benchmark to be met.

8 Group Certification Model

8.1 Analysis and conclusion

The requirements for group forest management certification of the revised Danish Forest Certification System are defined in PEFC DK 003-5.

PEFC DK 003-4 underwent a major revision by PEFC Denmark to align it with the new and revised requirements for group certification in forest management of PEFC International defined in the PEFC International Benchmark Standard PEFC ST 1002:2018, *Group Forest Management Certification – Requirements* published in 2018.

In the assessment four remaining minor nonconformities were identified in the updated group certification requirements provided by PEFC Denmark following the extended commenting period. The four minor nonconformities are related to PEFC ST 1002:2018, 5.2.1a) (commitment by group entity to comply with certification system requirements) 5.2.1b) (commitment by group entity to integrate group certification requirements into its management system), 5.2.2 (public availability of group entity's commitment) and 9.3.1.3 (pre-existing groups as group participants).

The system meets PEFC International's requirements for group forest management certification, PEFC ST 1002:2018 once corrective action on the four minor nonconformities has been successfully taken.

8.2 Assessment result – Nonconformities

For details on the minor nonconformity with PEFC ST 1002:2018, 5.2.1a) see Table 15.

Table 15, Minor nonconformity with PEFC ST 1002:2018, 5.2.1a)

PEFC benchmark requirement
PEFC ST 1002, 5.2.1a) 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;
Reference to system documentation (including quotation of relevant text)
PEFC DK 003-5, 5.4: "For each group member, there must be a written agreement between the forest owner (or an authorised representative of the forest owner) and the group leader to participate in group certification, thereby ensuring an organisational or contractual obligation to comply with <i>PEFC Denmark's Forest Management Standard – PEFC DK 001-4</i> ."
PEFC DK 003-5, 5.2: "It shall be demonstrated that the enterprise has established a management system in accordance with this standard (sections 5.3 – 5.9) and that all group members meet the requirements of <i>PEFC Denmark's Forest Management Standard – PEFC DK 001-4</i> . The enterprise is also obliged to continuously improve the management system and ensuring that the members of the group go on improving their forest management."

Assessment decision: Minor nonconformity
Justification: The standard does not require a commitment from the group entity to comply with any of the Danish PEFC system's requirements.

For details on the minor nonconformity with PEFC ST 1002:2018, 5.2.1b) see Table 16.

Table 16, Minor nonconformity with PEFC ST 1002:2018, 5.2.1b)

PEFC benchmark requirement
PEFC ST 1002, 5.2.1 The standard requires that the group entity shall provide a commitment: (...) b) to integrate the group certification requirements in the group management system;
Reference to system documentation (including quotation of relevant text)
PEFC DK 003-5, 5.4: "For each group member, there must be a written agreement between the forest owner (or an authorised representative of the forest owner) and the group leader to participate in group certification, thereby ensuring an organisational or contractual obligation to comply with PEFC Denmark's Forest Management Standard – PEFC DK 001-4."
PEFC DK 003-5, 5.2: "It shall be demonstrated that the enterprise has established a management system in accordance with this standard (sections 5.3 – 5.9) and that all group members meet the requirements of PEFC Denmark's Forest Management Standard – PEFC DK 001-4. The enterprise is also obliged to continuously improve the management system and ensuring that the members of the group go on improving their forest management."
Assessment decision: Minor nonconformity
Justification: The standard does not require a commitment from the group entity to integrate PEFC DK 003-5 requirements in its management system.

For details on the minor nonconformity with PEFC ST 1002:2018, 5.2.2 see Table 17.

Table 17, Minor nonconformity with PEFC ST 1002:2018, 5.2.2

PEFC benchmark requirement
PEFC ST 1002, 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.
Reference to system documentation (including quotation of relevant text)
PEFC DK 003-5 5.2 "(...) The group leader must have a described organisational structure and commitment in relation to their enterprise as a group administrator; in the form of an organisation chart, for example. The group leader must define and communicate roles, procedures, rights and duties for the work of a group leader. The group leader is obliged, upon request, to publish the group's general policy in relation to group members' obligations."
Assessment decision: Minor nonconformity
Justification: The standard does not require that the commitment of the group entity is publicly available as documented information upon request.

For details on the minor nonconformity with PEFC ST 1002:2018, 9.3.1.3 see **Table 18**.

Table 18, Minor nonconformity with PEFC ST 1002:2018, 9.3.1.3

PEFC benchmark requirement
PEFC ST 1002, 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.
Reference to system documentation (including quotation of relevant text)
PEFC Denmark comment: "Participation of pre-existing organisations or group or the members participation is not possible in the danish system."
Assessment decision: Minor nonconformity
Justification: The Danish PEFC System does not formally exclude participation of pre-existing organisations or group or the members.

9 Chain of Custody Standard and Trademark Use

The Danish Forest Certification System has adopted PEFC International's chain of custody standard, PEFC ST 2002:2020, and trademark rules, PEFC ST 2001:2020, as normative standards of its system documentation without any changes to document name, title and content.

The system therefore meets PEFC International's requirements for chain of custody standards and PEFC trademark rules.

9.1 Analysis and conclusion

9.2 Assessment result – Nonconformities

Not applicable

10 Certification and Accreditation Procedures

10.1 Chain of Custody

10.1.1 Analysis and conclusion

PEFC Denmark has adopted PEFC ST 2003:2020 as part of its system documentation without any changes to document name, title and content.

The system therefore meets PEFC International's requirements on certification and accreditation procedures for chain of custody certification.

10.1.2 Assessment result – Nonconformities

Not applicable

10.2 Forest Management

10.2.1 Analysis and conclusion

The requirements for accreditation and certification requirements for forest management certification under the revised Danish Forest Certification System are defined in PEFC DK 005-4.

PEFC DK 005-3 underwent a revision by PEFC Denmark's revision working group 2. As the PEFC International Benchmark requirements for accreditation and certification requirements for forest management certification had not changed since the last revision process, changes to PEFC DK 005 have been minor.

The assessment of PEFC DK 003-5 has not identified nonconformities with Annex 6 of the PEFC Document.

The accreditation and certification requirements for forest management certification under the revised Danish Forest Certification System therefore fully meet the PEFC International Benchmark.

10.2.2 Assessment result – Nonconformities

Not applicable

11 Other Aspects

An assessment of the revised Danish Forest Certification System's procedures for PEFC scheme administration against PEFC GD 1004, *Administration of PEFC scheme*, covering the notification of certification bodies, the issuance of PEFC trademark licenses as well as complaints and dispute resolution procedures, has not been included in the scope of this assessment and is expected to be carried out by PEFC International.

Annex A: PEFC Standard and System Requirements Checklist

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

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
Standardising Body			
5.1.1 The standardising body shall have written procedures for standard-setting activities describing:			
(a) its legal status and organisational structure, including a body responsible for consensus-building (working group, refer to 6.4) and procedures for formal adoption of the standard (refer to 7.1),	Procedures	YES	<p>PEFC DK 000-1, 7.1: "PEFC Denmark is a member-led, non-profit, self-owned and independent legal association that owns and is responsible for the development, administration and maintenance of the Danish scheme. PEFC Denmark has a board, a secretariat and an annual general meeting. Working groups are set up on an ad hoc basis where necessary; in connection with revision of the scheme, for example"</p> <p>PEFC DK 008-03, chapter 4, Responsibility for development and revision:</p> <p>"PEFC Denmark is responsible for the development and maintenance of the Danish PEFC certification system. The PEFC Denmark board must approve the developed and revised standards by a simple board majority in accordance with Article 5.6 of PEFC Denmark's Articles of Association."</p> <p>PEFC DK 008-03, chapter 6, Organisation of work and decision-making procedures in the working group:</p> <p>"(...) Consensus must be reached on the content of the final drafts from the working group before they can be approved by the PEFC Denmark board.</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
			<p>Consensus does not require unanimity, but according to the PEFC Council's definition of consensus (section 3.1 of PEFC ST 1001:2018), there must be no sustained opposition to significant issues from essential stakeholders; and the process must seek to take into account the views of all parties, as well as attempting to resolve potential conflicts.</p> <p>The working group must deploy one or a combination of the following options in order to check whether there is any sustained opposition to significant issues from essential stakeholders:</p> <ul style="list-style-type: none"> • a face-to-face meeting of the working group where the chairman can use agreed voting procedures to conclude that there are no non-conformances • a conference call where verbal yes/no indications are provided • by email, where a request for approval or objections is sent to the working group and they are invited to submit a written response. <p>No one stakeholder is able to dominate the process, and no organisation can shut it down.</p> <p>If there is sustained opposition to significant issues by essential stakeholders, the reasons for the oppositions must be justified and attempts must be made to resolve the point(s) of conflict in question by means of:</p> <ol style="list-style-type: none"> a) discussion and negotiation within the working group in an attempt to find a compromise b) direct negotiation between the stakeholder/stakeholder who putting forward the opposition and stakeholders with conflicting views on the subject in question

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
			<p>c) an appeals mechanism, as described in section 10”</p> <p>PEFC Denmark’s Statutes, 5.6: “The Board can establish working groups for particular tasks.</p> <p>For the five year revisions of the scheme, one or more workings groups shall be established. The working groups shall follow the at any time valid ”PEFC Denmark’s procedure for development and revision of the Danish PEFC certification scheme” (annex 1).</p> <p>The Board’s approval of changes to the documents has to be reached by simple majority.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
(b) procedures for keeping documented information,	Procedures	YES	<p>PEFC DK 000-1, chapter 9, Evidence:</p> <p>“To ensure transparency in the process:</p> <ul style="list-style-type: none"> • a report describing the revision process must be prepared at regular intervals in order to document compliance with the procedures • all completed drafts and the final documents approved by the PEFC Denmark board, including the report describing the revision process, must be published on the PEFC Denmark website in good time • all documents must be stored for 5 years and submitted upon request”

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
			<p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
(c) procedures for balanced representation of stakeholders,	Procedures	YES	<p>PEFC DK 008-03, chapter 5, Appointment of the working group:</p> <p>“(…)Stakeholders must represent different interests in sustainable forest management and may, for example, include representatives of: forest owners, forest-related industries and enterprises, environmental organisations, trade organisations, research, workers’ organisations, contractors, social organisations, retailers and other relevant organisations at a national or regional level.</p> <p>The stakeholder groups are defined by the PEFC Denmark board prior to the appointment of the working groups on the basis of charting of stakeholders that is relevant to the task in question. Stakeholder groups must be based on the UN definitions of ‘stakeholder’, see Agenda 21, Rio Convention. This charting operation must identify any disadvantaged stakeholders and key stakeholder groups and their primary interests in the group, as well as how best to reach the various groups. The composition of the group will be dependent on the areas and tasks to be undertaken by the group.</p> <p>The working groups must ensure balanced representation of stakeholders from different stakeholder groups, as well as balanced gender distribution.</p> <p>The working group must include stakeholders:</p> <ul style="list-style-type: none"> • with expertise within the standard to be revised • who will be affected directly by amendments to the standard

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
			<ul style="list-style-type: none"> • who may influence implementation of the standard <p>Stakeholders who will be affected directly by amendments to the standard in question must constitute a significant proportion of working group members.</p> <p>Specialists (researchers or other experts) may also be invited to participate in the work in order to provide necessary information. (...)”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
(d) the standard-setting process,	Procedures	YES	<p>PEFC DK 008-03 defines requirements for the standard/setting process in the following chapters:</p> <ul style="list-style-type: none"> 4. Responsibility for development and revision: 5. Appointment of the working group 6. Organisation of work and decision-making procedures in the working group 7. Consultation of parties 8. Test certification 10. Appeals mechanism <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
(e) the mechanism for reaching consensus, and	Procedures	YES	<p>PEFC DK 008-03, chapter 6, Organisation of work and decision-making procedures in the working group:</p> <p>“(…) Consensus must be reached on the content of the final drafts from the working group before they can be approved by the PEFC Denmark board.</p> <p>Consensus does not require unanimity, but according to the PEFC Council’s definition of consensus (section 3.1 of PEFC ST 1001:2018), there must be no sustained opposition to significant issues from essential stakeholders; and the process must seek to take into account the views of all parties, as well as attempting to resolve potential conflicts.</p> <p>The working group must deploy one or a combination of the following options in order to check whether there is any sustained opposition to significant issues from essential stakeholders:</p> <ul style="list-style-type: none"> • a face-to-face meeting of the working group where the chairman can use agreed voting procedures to conclude that there are no non-conformances • a conference call where verbal yes/no indications are provided • by email, where a request for approval or objections is sent to the working group and they are invited to submit a written response. <p>No one stakeholder is able to dominate the process, and no organisation can shut it down.</p> <p>If there is sustained opposition to significant issues by essential stakeholders, the reasons for the oppositions must be justified and attempts must be made to resolve the point(s) of conflict in question by means of:</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
			<p>a) discussion and negotiation within the working group in an attempt to find a compromise</p> <p>b) direct negotiation between the stakeholder/stakeholder who putting forward the opposition and stakeholders with conflicting views on the subject in question</p> <p>c) an appeals mechanism, as described in section 10"</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
(f) review and revision of standard(s)/normative document(s).	Procedures	YES	<p>PEFC DK 008-03, 2. Scope:</p> <p>"This document describes the procedures for the development and revision of standards pursuant to the Danish PEFC certification system. The procedures must used for the revisions every five years and when developing new standards pursuant to the Danish system."</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
5.1.2 The standardising body shall make its standard-setting procedures publicly available and shall review its standard-setting procedures regularly. The review shall consider feedback from stakeholders.	Procedures	YES	<p>PEFC DK 008-03, 4: "(...) The Danish PEFC system must be revised at least every five years. The board makes decisions on the commencement of development and revision of the Danish PEFC certification system. (...)"</p> <p>PEFC DK 008-03, 7: "(...) When the revision commences, an open invitation to participate in the process must be issued and parties must be given the opportunity to comment on the content and procedures for the</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
			<p>revision/development of the standard.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
	Process	YES	<p>PEFC Denmark comment: “This document was approved by the board in 2018 because PEFC Denmark did not have an extension to delay the revision. After the extension was given from PEFC International the document was part of the revision (2019-2021) public consultation and no feedback was received from stakeholders. The document was public available. https://www.pefc.dk/nyheder/offentlig-horing-af-pefc-danmarks-system</p> <p>The board of PEFC Denmark will have a board meeting December 1st 2021 where changes to this procedure and all other standards will be finally approved. This will be announced on the PEFC Denmark website https://www.pefc.dk/nyheder/pefc-danmarks-nye-standarder”</p> <p>Evidence: PEFC Denmark website, Development Report (compilation of comments)</p> <p>Assessment decision: Conformity</p> <p>Justification: Standard-setting procedures have been publicly available, regularly reviewed and published for commenting. No comments that could have been considered were received.</p>
5.2.1 The standardising body shall keep documented information relevant to the standard-setting and review process. Evidence of compliance with the requirements of this standard and the standardising body’s own procedures includes:			

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
(a) Standard-setting procedures,	Procedures	YES	<p>PEFC DK 008-03, Procedure for the development and revision of the Danish PEFC certification system, Revised standard August 2018 – Rev 1</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
	Process	YES	<p>PEFC DK 008-03 has been in place during the comprehensive system revision and was the guideline followed in the revision process.</p> <p>Evidence: Development report, records (minutes, website https://www.pefc.dk/om-pefc/pefc-danmarks-arbejde/projekter/revisionen-af-pefc-danmarks-system)</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
(b) Stakeholder identification mapping,	Procedures	YES	<p>PEFC DK 008-03, 5: “(...) The stakeholder groups are defined by the PEFC Denmark board prior to the appointment of the working groups on the basis of charting of stakeholders that is relevant to the task in question. Stakeholder groups must be based on the UN definitions of ‘stakeholder’, see Agenda 21, Rio Convention. This charting operation must identify any disadvantaged stakeholders and key stakeholder groups and their primary interests in the group, as well as how best to reach the various groups. The composition of the group will be dependent on the areas and tasks to be undertaken by the group. (...)”</p> <p>PEFC DK 008-03, 9, Evidence:</p> <p>“To ensure transparency in the process:</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
			<ul style="list-style-type: none"> • a report describing the revision process must be prepared at regular intervals in order to document compliance with the procedures • all completed drafts and the final documents approved by the PEFC Denmark board, including the report describing the revision process, must be published on the PEFC Denmark website in good time • all documents must be stored for 5 years and submitted upon request” <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
	Process		<p>All stakeholders were mapped in an excel file.</p> <p>Evidence: Stakeholder overview (<i>Contact info of stakeholders identified in the stakeholder mapping</i>)</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
(c) Contacted and/or invited stakeholders,	Procedures	YES	<p>PEFC DK 008-03, 5</p> <p>“All stakeholders are invited to participate in the 5-year revisions of the Danish PEFC certification system. These parties are not required to be members of PEFC Denmark. Stakeholders must be given at least one month in which to nominate people for the working groups. (...)”</p> <p>PEFC DK 008-03, 7: “The commencement of the revision is announced on the PEFC</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
			<p>Denmark website.</p> <p>When the revision commences, an open invitation to participate in the process must be issued and parties must be given the opportunity to comment on the content and procedures for the revision/development of the standard.</p> <p>Drafts of new or revised standards that have been prepared in detail are sent for public consultation in an appropriate manner (via the website, newsletters, etc.) for a minimum of 60 days. Information on the consultation will be sent directly to all stakeholders identified as relevant at the start of the revision/development. Attempts must be made to reach any disadvantaged stakeholders and identified key stakeholders in the manner identified by the PEFC Denmark board in connection with the charting operation. (...)</p> <p>PEFC DK 008-03, 9, Evidence:</p> <p>“To ensure transparency in the process:</p> <ul style="list-style-type: none"> • a report describing the revision process must be prepared at regular intervals in order to document compliance with the procedures • all completed drafts and the final documents approved by the PEFC Denmark board, including the report describing the revision process, must be published on the PEFC Denmark website in good time • all documents must be stored for 5 years and submitted upon request” <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement can be considered as met.</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
	Process	YES	<p>According to PEFC Denmark, "Stakeholders were contacted by e-mail and followed up by e-mail and phone call if no response."</p> <p>Evidence:</p> <ul style="list-style-type: none"> - Stakeholder survey - Public announcement on website: https://pefc.dk/nyheder/revision-af-den-danske-skovstandard <p>Stakeholder map with status on direct invitation and answer of stakeholders</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
(d) Stakeholders involved in standard-setting activities including participants in each working group meeting,	Procedures	YES	<p>PEFC DK 008-03, 6:</p> <p>The work of the working group must be based on open communication and understanding and be organised such that:</p> <ul style="list-style-type: none"> • all drafts and other relevant papers for the revision work are available to all members of the working group. List of participants in working group meetings shall be recorded." <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
	Process	YES	All meetings and participation of stakeholders were documented

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
			<p>Evidence:</p> <ul style="list-style-type: none"> - Compilation of stakeholder comments in the development Report - Letters from stakeholders - Minutes of WG meetings with participant list <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
(e) Feedback received and a synopsis of how feedback was addressed,	Procedures	YES	<p>PEFC DK 008-03, 7:</p> <p>“When the revision commences, an open invitation to participate in the process must be issued and parties must be given the opportunity to comment on the content and procedures for the revision/development of the standard.</p> <p>Drafts of new or revised standards that have been prepared in detail are sent for public consultation in an appropriate manner (via the website, newsletters, etc.) for a minimum of 60 days. Information on the consultation will be sent directly to all stakeholders identified as relevant at the start of the revision/development. (...) The responses received must all be presented to the working group and discussed, and relevant comments must be incorporated. A summary of the comments received and the working groups’ discussion of these comments must be published on the PEFC Denmark website. Information on this must be sent directly to the parties that have contributed responses to the consultation.”</p> <p>Assessment decision: Conformity</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
			Justification: The benchmark requirement is met.
	Process	YES	<p>All feedback was publicly available on website and a reply was send from the feedback.</p> <p>Evidence:</p> <ul style="list-style-type: none"> - Compilation of stakeholder comments and consideration by the WG in the development Report - Minutes of WG meetings <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
(f) All drafts and final versions of the standard,	Procedures	YES	<p>PEFC DK 008-03, 9:</p> <p>“To ensure transparency in the process: (...)</p> <ul style="list-style-type: none"> • all completed drafts and the final documents approved by the PEFC Denmark board, including the report describing the revision process, must be published on the PEFC Denmark website in good time • all documents must be stored for 5 years and submitted upon request” <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
	Process	YES	<p>PEFC Denmark comment: "All documents and drafts are stored online PEFC Denmark archive. Please see new documentation, document: "saved drafts standard""</p> <p>Evidence: Screenshots of saved documents. (<i>"Saved draft standards"</i>)</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
(g) Outcomes from working group considerations,	Procedures	YES	<p>PEFC DK 008-03, chapter 7:</p> <p>"A summary of the comments received and the working groups' discussion of these comments must be published on the PEFC Denmark website. Information on this must be sent directly to the parties that have contributed responses to the consultation."</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement can be considered as met.</p>
	Process	YES	<p>Minutes of all WG meetings and a compilation of comments from consultation and their consideration by the WG have been recorded.</p> <p>Evidence:</p> <ul style="list-style-type: none"> - Development report (comments and their consideration) - Minutes

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
			Assessment decision: Conformity Justification: The benchmark requirement is met.
(h) Evidence of consensus on the final version of the standard(s),	Procedures	YES	<p>PEFC DK 008-03, 6:</p> <p>“Consensus must be reached on the content of the final drafts from the working group before they can be approved by the PEFC Denmark board. Evidence of consensus shall be recorded.”</p> <p>PEFC DK 008-03, 9:</p> <p>“To ensure transparency in the process:</p> <ul style="list-style-type: none"> • a report describing the revision process must be prepared at regular intervals in order to document compliance with the procedures • all completed drafts and the final documents approved by the PEFC Denmark board, including the report describing the revision process, must be published on the PEFC Denmark website in good time • all documents must be stored for 5 years and submitted upon request” <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
	Process	YES	<p>A meeting was held and from the summary a consensus was described. No comments by the stakeholder to the summary in regard to consensus.</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
			<p>Evidence: Minutes of meetings (Development Report)</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
(i) Evidence relating to the review process, and	Procedures	YES	<p>PEFC DK 008-03, 4: “(...) The Danish PEFC system must be revised at least every five years. The board makes decisions on the commencement of development and revision of the Danish PEFC certification system. The board must appoint one or more working groups in connection with development and revision of the standards. (...)</p> <p>PEFC DK 008-03, 9:</p> <p>“To ensure transparency in the process:</p> <ul style="list-style-type: none"> • a report describing the revision process must be prepared at regular intervals in order to document compliance with the procedures • all completed drafts and the final documents approved by the PEFC Denmark board, including the report describing the revision process, must be published on the PEFC Denmark website in good time • all documents must be stored for 5 years and submitted upon request” <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement can be considered as met.</p>
	Process	N/	<p>A formal review to determine whether or not the forest management standard required a revision did not take place in this revision as it was clear from the</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
		A	<p>beginning that the standard had to be revised in order to meet the requirements of PEFC ST 1003:2018.</p> <p>Assessment decision: N/A</p> <p>Justification: The benchmark requirement is not applicable.</p>
(j) Final approval by the standardising body.	Procedures	YES	<p>PEFC DK 008-03, 9:</p> <p>“To ensure transparency in the process:</p> <ul style="list-style-type: none"> • a report describing the revision process must be prepared at regular intervals in order to document compliance with the procedures • all completed drafts and the final documents approved by the PEFC Denmark board, including the report describing the revision process, must be published on the PEFC Denmark website in good time • all documents must be stored for 5 years and submitted upon request” <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement can be considered as met.</p>
	Process	YES	<p>The PEFC board approved the final draft before it was submitted for PEFC assessment and endorsement.</p> <p>Evidence:</p> <ul style="list-style-type: none"> - Development report

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
			<p>- Note in revised standard (Approved by: PEFC Denmark, Date: 05.03.2021)</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement can be considered as met.</p>
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	<p>PEFC DK 008-03, 9: “(...)• all documents must be stored for 5 years and submitted upon request”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met</p>
	Process	YES	<p>All document related to this new standard and the standard before is kept online.</p> <p>Evidence:</p> <p>- Documentation submitted for PEFC assessment and endorsement, including revision related records</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement can be considered as met.</p>
5.2.3 Documented information shall be available to interested parties upon request.	Procedures	YES	<p>PEFC DK 008-03, 9: “To ensure transparency in the process:</p> <ul style="list-style-type: none"> • a report describing the revision process must be prepared at regular intervals in order to document compliance with the procedures • all completed drafts and the final documents approved by the PEFC Denmark board, including the report describing the revision process, must be published on

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
			<p>the PEFC Denmark website in good time</p> <ul style="list-style-type: none"> • all documents must be stored for 5 years and submitted upon request” <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement</p>
	Process	YES	<p>All documents are on PEFC website</p> <p>Evidence:</p> <p>- https://www.pefc.dk/search?q=revision</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
5.3.1 The standardising body shall establish procedure(s) for dealing with any substantial and process complaints and appeals relating to its standard-setting activities. It must make procedure(s) accessible to stakeholders. Upon receipt of a complaint or appeal, the standardising body shall:			
(a) acknowledge receipt of the complaint or appeal to the complainant,	Procedures	YES	<p>PEFC DK 008-03, 10: “When receiving an appeal, the PEFC Denmark board must: acknowledge receipt of the appeal (...)”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
	Process	YES	<p>According to PEFC Denmark, no complaints were made during the revision.</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
			<p>Evidence:</p> <p>- Stakeholder survey</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</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 DK 008-03, 10: "When receiving an appeal, the PEFC Denmark board must:</p> <ul style="list-style-type: none"> • acknowledge receipt of the appeal • collect and verify the information necessary to validate the appeal • appoint an impartial appeals committee with the necessary expertise to assess the appeal objectively and impartially: this committee must make a recommendation for a resolution to the board within one month of its establishment • make a decision on the appeal on the basis of the appeals committee's recommendation" <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
	Process	YES	<p>According to PEFC Denmark, no complaints were made during the revision.</p> <p>Evidence:</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
			<p>- Stakeholder survey</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
(c) formally communicate the decision on the complaint or appeal to the complainant and describe the handling process.	Procedures	YES	<p>PEFC DK 008-03, 10: "When receiving an appeal, the PEFC Denmark board must: (...) formally notify the appellant of the outcome of the appeal and provide information about the appeal process."</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement</p>
	Process	YES	<p>According to PEFC Denmark, no complaints were made during the revision.</p> <p>Evidence:</p> <p>- Stakeholder survey</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
5.3.2 The standardising body shall establish at least one contact point for enquiries, complaints and appeals relating to its standard-setting activities. The contact point shall be easy to access and readily available.	Procedures	YES	<p>PEFC DK 008-03, 10: "PEFC Denmark must appoint a contact person for all enquiries related to the development/revision of the standard when standards are revised and developed pursuant to the Danish PEFC certification system. This must be made readily accessible via the PEFC Denmark website. (...) "</p> <p>Assessment decision: Conformity</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
			Justification: The benchmark requirement is met.
	Process	YES	<p>The contact information of the PEFC Denmark secretariat as contact point for enquires and complaints is published online.</p> <p>Evidence:</p> <p>- https://www.pefc.dk/kontakt-os</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</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 DK 008-03, Section 4: "For the creation of a new standard PEFC Denmark shall develop a proposal including: A. The scope of the standard (...)"</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
	Process	YES	<p>No new standards were developed.</p> <p>Evidence: Submitted system documentation</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
			Assessment decision: Conformity Justification: The benchmark requirement is met.
(b) a justification of the need for the standard,	Procedures	YES	PEFC DK 008-03, Section 4: "For the creation of a new standard PEFC Denmark shall develop a proposal including: (...) B. Justification of the need for the standard (...)" Assessment decision: Conformity Justification: The benchmark requirement is met.
	Process	YES	No new standards were developed. Evidence: - Submitted system documentation Assessment decision: Conformity Justification: The benchmark requirement is met.
(c) a clear description of the intended outcomes	Procedures	YES	PEFC DK 008-03, Section 4: "For the creation of a new standard PEFC Denmark shall develop a proposal including: (...) C. A clear description of the intended outcomes (...)" Assessment decision: Conformity Justification: The benchmark requirement is met.

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
	Process	YES	<p>No new standards were developed.</p> <p>Evidence:</p> <ul style="list-style-type: none"> - Submitted system documentation <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
<p>(d) a risk assessment of potential negative impacts arising from implementing the standard, such as</p> <ul style="list-style-type: none"> • factors that could affect the achievement of the outcomes negatively, • unintended consequences of implementation, • actions to address the identified risks, and <p>(e) a description of the stages of standard development and their expected timetable.</p> <p>NOTE Guidance for development of a proposal and</p>	Procedures	YES	<p>PEFC DK 008-03, Section 4: “For the creation of a new standard PEFC Denmark shall develop a proposal including: (...) D. A risk assessment of potential negative impacts arising from implementing the standard, such as;</p> <ul style="list-style-type: none"> • Factors that could affect the achievement of the outcomes negatively • Unintended consequences of implementation • Actions to address the identified risks <p>E. A description of the stages of standard development and their expected timetable”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
justification is given in ISO Directives, Part 1, Annex C and Annex SL (Appendix 1).	Process	YES	<p>No new standards were developed.</p> <p>Evidence:</p> <ul style="list-style-type: none"> - Submitted system documentation <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
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 DK 008-03, Section 4: "For the creation of a new standard PEFC Denmark shall develop a proposal including:</p> <p>A. The scope of the standard (...)</p> <p>E. A description of the stages of standard development and their expected timetable</p> <p>For the revision of a standard the proposal shall cover at least (A) and (E)."</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
	Process	YES	<p>The announcement of the standard setting process included an overview of the documents covered, working group established and next steps in the revision process.</p> <p>Evidence: https://pefc.dk/events/revision-af-det-danske-pefc-systemet</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
			Assessment decision: Conformity Justification: The benchmark requirement is met.
6.2.1 The standardising body shall identify stakeholders relevant to the objectives and scope of the standard-setting activities by means of a stakeholder identification mapping exercise. It shall define which stakeholder groups are relevant to the subject matter and why. For each stakeholder group the standardising body shall identify the likely key issues, key stakeholders, and which means of communication would be best to reach them.	Procedures	YES	PEFC DK 008-3, 5: "(...) The stakeholder groups are defined by the PEFC Denmark board prior to the appointment of the working groups on the basis of charting of stakeholders that is relevant to the task in question. Stakeholder groups must be based on the UN definitions of 'stakeholder', see Agenda 21, Rio Convention. This charting operation must identify any disadvantaged stakeholders and key stakeholder groups and their primary interests in the group, as well as how best to reach the various groups. (...)" Assessment decision: Conformity Justification: The benchmark requirement is met.
	Process	YES	PEFC Denmark carried out a stakeholder mapping at the beginning of the revision process, which identified stakeholder groups, key stakeholders, key issues and contact details. Evidence: "Stakeholder mapped - Liste over inviterede interessenter" Assessment decision: Conformity Justification: The benchmark requirement is met.

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
<p>6.2.2 Identification of stakeholder groups shall be based on nine major stakeholder groups as defined by Agenda 21 of the <i>United Nations Conference on Environment and Development</i> (UNCED) in Rio de Janeiro in 1992. At least the following groups shall be included in the stakeholder mapping:</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. 	Procedures	YES	<p>PEFC DK 008-3, 5: "(...) Stakeholders must represent different interests in sustainable forest management and may, for example, include representatives of: forest owners, forest-related industries and enterprises, environmental organisations, trade organisations, research, workers' organisations, contractors, social organisations, retailers and other relevant organisations at a national or regional level.</p> <p>The stakeholder groups are defined by the PEFC Denmark board prior to the appointment of the working groups on the basis of charting of stakeholders that is relevant to the task in question. Stakeholder groups must be based on the UN definitions of 'stakeholder', see Agenda 21, Rio Convention. This charting operation must identify any disadvantaged stakeholders and key stakeholder groups and their primary interests in the group, as well as how best to reach the various groups. (...) "</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
<p>Other groups shall be added if relevant to the scope of standard-setting activities.</p> <p>NOTE The full list of nine major stakeholder groups defined by Agenda 21 of the <i>United Nations Conference on Environment and Development</i> 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.</p>	Process	YES	<p>All stakeholder groups required we included in the stakeholder mapping, except for indigenous people, due to non-applicability in Denmark.</p> <p>Evidence:</p> <p>- Stakeholder map</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
<p>6.2.3 The standardising body shall identify disadvantaged stakeholders and key stakeholders and address any constraints to their participation in standard-setting activities.</p> <p>NOTE A stakeholder can be both a disadvantaged and a key stakeholder at the same time.</p>	Procedures	YES	<p>PEFC DK 008-3, 5: “(...) All stakeholders are invited to participate in the 5-year revisions of the Danish PEFC certification system. PEFC Denmark shall identify disadvantaged stakeholders and key stakeholders and address any constraints to their participation in standard-setting activities. A stakeholder can be both a disadvantaged and a key stakeholder at the same time. (...)”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
	Process	NO	<p>PEFC Denmark carried out a stakeholder mapping at the beginning of the revision process, which identified stakeholder groups, key stakeholders, key issues and contact details.</p> <p>Evidence: “Stakeholder mapped - Liste over inviterede interessenter”</p> <p>Assessment decision: Minor nonconformity</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
			Justification: It is not evident from the documentation provided that any potential constraints for the participation of key and disadvantaged stakeholders were identified and addressed, if necessary.
<p>6.3.1 The standardising body shall make a public announcement of the start of the standard-setting process and include an invitation to stakeholders to participate in the process. The announcement shall be made in a timely manner through suitable media, as appropriate, to give stakeholders an opportunity for meaningful contributions.</p> <p>NOTE 1 <i>In a timely manner</i> means (at the latest) four weeks before the first standard-setting activity is scheduled to occur.</p> <p>NOTE 2 <i>Through suitable media</i> means at least through the standardising body's website and by email and/or letter to identified stakeholders. Other media includes press releases, news articles, features in trade-press, information sent to branch organisations, social media, digital media, etc.</p>	Procedures	YES	<p>PEFC DK 008-3, 4: "(...) The commencement of revision and the development of new standards must be communicated to the general public in an appropriate manner (via the website, newsletters, etc.)."</p> <p>PEFC DK 008-3, 5: "All stakeholders are invited to participate in the 5-year revisions of the Danish PEFC certification system. (...) "</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
	Process	YES	<p>The begin of the revision process was publicly announced on PEFC Denmark's website on 30th July 2019.</p> <p>Evidence:</p> <p>https://pefc.dk/events/revision-af-det-danske-pefc-systemet</p> <p>Assessment decision: Minor nonconformity</p> <p>Justification: From the submitted documentation it is not evident that the public announcement included an invitation to stakeholders to participate in the process. The benchmark requirement can therefore not be considered as fully met.</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
6.3.1 The announcement and invitation shall include:			
(a) overview of the standard-setting process,	Procedures	YES	<p>PEFC DK 008-3, 4: “(...) The commencement of revision and the development of new standards must be communicated to the general public in an appropriate manner (via the website, newsletters, etc.).”</p> <p>PEFC DK 008-3, 5: “All stakeholders are invited to participate in the 5-year revisions of the Danish PEFC certification system. These parties are not required to be members of PEFC Denmark. Stakeholders must be given at least one month in which to nominate people for the working groups.</p> <p>The invitation must include:</p> <p>(...) • a schedule for the process (...)</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
	Process	YES	<p>The announcement of the standard setting process included an overview of the documents covered, working group established and next steps in the revision process.</p> <p>Evidence:</p> <p>https://pefc.dk/nyheder/revision-af-pefc-systemet</p> <p>Assessment decision: Conformity</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
			Justification: The benchmark requirement can be considered as met.
(b) access to the proposal for the standard (refer to 6.1),	Procedures	YES	<p>PEFC DK 008-3, 4: "(...) The commencement of revision and the development of new standards must be communicated to the general public in an appropriate manner (via the website, newsletters, etc.)."</p> <p>PEFC DK 008-3, 5: "All stakeholders are invited to participate in the 5-year revisions of the Danish PEFC certification system. These parties are not required to be members of PEFC Denmark. Stakeholders must be given at least one month in which to nominate people for the working groups.</p> <p>The invitation must include:</p> <ul style="list-style-type: none"> • the purpose, content and procedures for the revision/development of the standard • a schedule for the process (...)" <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
	Process	YES	<p>The announcement of the standard setting process included an overview of the documents covered, working group established and next steps in the revision process.</p> <p>Evidence:</p> <p>https://pefc.dk/events/revision-af-det-danske-pefc-systemet</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
			<p>Assessment decision: Conformity</p> <p>Justification: The announcement provided information on scope and expected schedule for the standard revision, which is considered sufficient as proposal for the revision of existing standards by PEFC ST 1001:2017, 6.1.2</p>
(c) information about opportunities for stakeholders to participate in the process,	Procedures	YES	<p>PEFC DK 008-3, 4: "(...) The commencement of revision and the development of new standards must be communicated to the general public in an appropriate manner (via the website, newsletters, etc.)."</p> <p>PEFC DK 008-3, 5: "All stakeholders are invited to participate in the 5-year revisions of the Danish PEFC certification system. These parties are not required to be members of PEFC Denmark. Stakeholders must be given at least one month in which to nominate people for the working groups.</p> <p>The invitation must include:</p> <p>(...) • information on the option of participating in the process (...)"</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
	Process	YES	<p>The announcement included information about opportunities for stakeholders to participate in the process.</p> <p>Evidence:</p> <p>https://pefc.dk/nyheder/revision-af-pefc-systemet</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
			Assessment decision: Conformity Justification: The benchmark requirement is met.
(d) requests to stakeholders to nominate their representative(s) or themselves to the working group (refer to 6.4). The request to disadvantaged stakeholders and key stakeholders shall be made in a manner that ensures that the information reaches intended recipients and in a format that is easy to understand,	Procedures	YES	<p>PEFC DK 008-3, 4: "(...) The commencement of revision and the development of new standards must be communicated to the general public in an appropriate manner (via the website, newsletters, etc.)."</p> <p>PEFC DK 008-3, 5: "All stakeholders are invited to participate in the 5-year revisions of the Danish PEFC certification system. These parties are not required to be members of PEFC Denmark. Stakeholders must be given at least one month in which to nominate people for the working groups.</p> <p>The invitation must include:</p> <ul style="list-style-type: none"> • a request to key stakeholders to appoint a representative for the working group. (...)This charting operation must identify any disadvantaged stakeholders and key stakeholder groups and their primary interests in the group, as well as how best to reach the various groups." <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
	Process	YES	<p>The announcement included information about opportunities for stakeholders to participate in the process.</p> <p>Evidence:</p> <p>https://pefc.dk/nyheder/revision-af-pefc-systemet</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
			Assessment decision: Conformity Justification: The benchmark requirement is met.
(e) explicit invitation and clear instruction on how to submit feedback on the scope and standard-setting process, and	Procedures	YES	<p>PEFC DK 008-3, 5: "All stakeholders are invited to participate in the 5-year revisions of the Danish PEFC certification system. These parties are not required to be members of PEFC Denmark. Stakeholders must be given at least one month in which to nominate people for the working groups.</p> <p>The invitation must include:</p> <p>(...) • information on the option of participating in the process</p> <ul style="list-style-type: none"> • a request to key stakeholders to appoint a representative for the working group • a request to comment on the content and procedures for the revision/development of the standard • reference to the publicly accessible procedures for the revision and development of the Danish PEFC certification system." <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement can be considered as met.</p>
	Process	NO	<p>https://pefc.dk/nyheder/revision-af-pefc-systemet</p> <p>PEFC Denmark comment:</p> <p>"https://www.pefc.dk/nyheder/offentlig-horing-af-pefc-danmarks-system</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
			<p>See box, where it is described how to submit and a instruction document was made if any stakeholders would like to use it</p> <p>"Indsend høringssvar</p> <p>Alle høringssvar bedes sendes til PEFC Danmark på info@pefc.dk. Efter modtagelsen vil PEFC Danmark kvittere for modtagelsen. Modtager du ikke en kvittering inden 14 dage, så kontakt PEFC Danmark, Morten Thorøe, på 60 60 56 49 eller mt@pefc.dk.</p> <p>Høringssvar kan også sendes til PEFC Danmark kontor på adressen: PEFC Danmark, Sdr. Tingvej 10, 6630 Rødding</p> <p>Vi opfordrer alle til at bruge følgende skema til at indsende deres høringsvar - Hent dokumentet her."</p> <p>Assessment decision: Minor Nonconformity</p> <p>Justification: The announcement of the revision process did not include an explicit invitation and clear instruction on how to submit feedback on the scope and standard-setting process. The evidence provided by PEFC Denmark after the commenting period refers to the announcement of the public consultation on the enquiry drafts of revised system documentation at the end of the revision process, not the invitation to participate in the revision process at the start of the revision process, as required by this benchmark.</p>
	Procedures	YES	PEFC DK 008-3, 5: "All stakeholders are invited to participate in the 5-year revisions of the Danish PEFC certification system. These parties are not required to be

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
(f) access to the standard-setting procedures.			<p>members of PEFC Denmark. Stakeholders must be given at least one month in which to nominate people for the working groups.</p> <p>The invitation must include:</p> <p>(...) • reference to the publicly accessible procedures for the revision and development of the Danish PEFC certification system.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
	Process	YES	<p>Direct access to the standard setting procedures was provided in the announcement.</p> <p>https://pefc.dk/nyheder/revision-af-pefc-systemet</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
6.3.2 The standardising body shall review the standard-setting process based on feedback received in response to the public announcement.	Procedures		<p>PEFC DK 008-3, 5: “(...) The PEFC Denmark board must reassess the procedures submitted for revision on the basis of any comments from stakeholders (...)”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
	Process	YES	<p>Direct access to the standard setting procedures was provided in the announcement.</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
			https://pefc.dk/nyheder/revision-af-pefc-systemet PEFC Denmark comment: "PEFC DK 008-03 was part of the revision (2019-2021) and public consultation and no feedback was received from stakeholders. The document was public available." Assessment decision: Conformity Justification: The benchmark requirement can be considered as met.
6.4.1 The standardising body shall establish a permanent or temporary working group or adjust the composition of an already existing working group based on nominations it received. Acceptance and refusal of nominations shall be justified in relation to the requirements for balanced representation of the working group, considerations of an appropriate gender balance, relevance of the organisation, an individual's competence, an individual's relevant experience and resources available for standard-setting.	Procedures	YES	PEFC DK 008-3, 4: "(...) The board must appoint one or more working groups in connection with development and revision of the standards. (...) " PEFC DK 008-3, 5: "(...) The working groups must ensure balanced representation of stakeholders from different stakeholder groups, as well as balanced gender distribution. The working group must include stakeholders: <ul style="list-style-type: none"> • with expertise within the standard to be revised • who will be affected directly by amendments to the standard • who may influence implementation of the standard Stakeholders who will be affected directly by amendments to the standard in question must constitute a significant proportion of working group members. Specialists (researchers or other experts) may also be invited to participate in the work in order to provide necessary information.

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
			<p>The PEFC Denmark board must reassess the procedures submitted for revision on the basis of any comments from stakeholders and compile the working groups on the basis of recommendations from the invited stakeholders. It must be possible to state reasons for any acceptance or refusal to participate in the working group on the basis of the need for balanced representation in the working groups or the resources available for the work.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
	Process	YES	<p>Development report, The PEFC Denmark secretariat: “(...) After approval by the PEFC Denmark board, the secretariat issued invitations to stakeholders asking them to participate in the two working groups decided upon. Not all stakeholders chose to participate in the work, but the composition of the working groups broadly reflects the various stakeholders for sustainable forest management.”</p> <p>PEFC Denmark comment: “All nominations were approved and therefore no information with regard to refusal of nominations was provided.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
6.4.2 The working group shall:			
(a) have balanced representation and decision-making by	Procedures	YES	PEFC DK 008-3, 5: “(...) The working groups must ensure balanced representation of stakeholders from different stakeholder groups, as well as balanced gender

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
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			<p>distribution. (...)”</p> <p>PEFC DK 008-3, 5: “(...) No one stakeholder is able to dominate the process, and no organisation can shut it down. (...)”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
	Process	YES	<p>Evidence: “Stakeholder mapped - Liste over inviterede interessenter”, WG minutes</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
(b) include stakeholders with expertise relevant to the subject matter of the standard, those that affected by the standard, and those that can influence implementation of the standard. The affected stakeholders shall be represented in an appropriate proportion among participants.	Procedures	YES	<p>PEFC DK 008-3, 5: “(...) The working group must include stakeholders:</p> <ul style="list-style-type: none"> • with expertise within the standard to be revised • who will be affected directly by amendments to the standard • who may influence implementation of the standard <p>Stakeholders who will be affected directly by amendments to the standard in question must constitute a significant proportion of working group members. (...)”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
	Process	YES	<p>The WG was composed of members with expertise relevant to the subject matter of the standard, that are affected by the standard (in an appropriate proportion), and that can influence its implementation.</p> <p>Evidence:</p> <p>Development report (WG member list, Minutes)</p> <p>Assessment decision: Conformity</p> <p>Justification: Based on the organisations represented by the WG members the benchmark requirement can be considered as met.</p>
<p>6.4.3 In order to achieve balanced representation, the standardising body shall strive to have all identified stakeholder groups (refer to 6.2) represented. The standardising body shall set targets for the participation of key stakeholders and proactively seek their participation by using outreach such as (but not limited to) personal emails, phone calls, meeting invitations etc.</p> <p>NOTE When a stakeholder group is not represented and key stakeholders cannot be encouraged to participate, the standardising body may consider alternative options.</p>	Procedures	YES	<p>PEFC DK 008-3, 5: “(...). This charting operation must identify any disadvantaged stakeholders and key stakeholder groups and their primary interests in the group, as well as how best to reach the various groups. PEFC Denmark 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.” The composition of the group will be dependent on the areas and tasks to be undertaken by the group.</p> <p>The working groups must ensure balanced representation of stakeholders from different stakeholder groups, as well as balanced gender distribution. (...)</p> <p>PEFC DK 008-3, 7: “(...) Attempts must be made to reach any disadvantaged stakeholders and identified key stakeholders in the manner identified by the PEFC Denmark board in connection with the charting operation. (...)”</p> <p>Assessment decision: Conformity</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
			Justification: The benchmark is met.
	Process	YES	<p>Evidence: "Stakeholder mapped - Liste over inviterede interessenter"</p> <p>Assessment decision: Conformity</p> <p>Justification: The provided list provides information on stakeholder groups, key stakeholders and outreach methods used. The benchmark is met.</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 DK 008-3, 6: "The work of the working group must be based on open communication and understanding and be organised such that:</p> <ul style="list-style-type: none"> all drafts and other relevant papers for the revision work are available to all members of the working group (...)" <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
	Process	YES	<p>The work of the working group was based on open communication and understanding, organised and all drafts and other relevant papers for the revision work were available to all members of the working group.</p> <p>Evidence:</p> <p>Development report, minutes</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
			Assessment decision: Conformity Justification: The benchmark requirement is met.
(b) all members of the working group shall be given meaningful opportunities to contribute to the development or revision of the standard and to provide feedback on working drafts, and	Procedures	YES	PEFC DK 008-3, 6: "(...) all members of the working group have reasonable opportunities to contribute to the work of the group and submit comments on the drafts (...)" Assessment decision: Conformity Justification: The benchmark requirement is met.
	Process	YES	All members of the working group had meaningful opportunities to contribute to the development or revision of the standard and to provide feedback on working drafts. Evidence: Development report, minutes Assessment decision: Conformity Justification: The benchmark requirement is met.
(c) feedback and views given by any member of the working group shall be considered in an open and transparent way where the outcome of these	Procedures	YES	PEFC DK 008-3, 6: "(...) all comments and opinions from members of the working group are assessed in an open and transparent manner and recorded." Assessment decision: Conformity Justification: The benchmark requirement is met.

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
considerations is recorded.	Process	YES	<p>Feedback and views given by any member of the working group were considered in an open and transparent way and the outcome of these considerations is recorded.</p> <p>Evidence:</p> <p>Development report, minutes</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
6.4.5 The decision of the working group to recommend the final draft for formal approval shall be taken on the basis of consensus. In order to determine whether there is any sustained opposition, the working group can utilise the following methods:			
(a) face-to face meeting(s) where there is a verbal yes/no vote, a show of hands for a yes/no vote; a statement on consensus from the Chair when there are no dissenting voices or hands (votes); a formal ballot, etc.,	Procedures	YES	<p>PEFC DK 008-3, 6: "(...) Consensus must be reached on the content of the final drafts from the working group before they can be approved by the PEFC Denmark board. (...) The working group must deploy one or a combination of the following options in order to check whether there is any sustained opposition to significant issues from essential stakeholders:</p> <ul style="list-style-type: none"> a face-to-face meeting of the working group where the chairman can use agreed voting procedures to conclude that there are no non-conformances (...)" <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
	Process	YES	<p>Consensus on the final draft was found by the WG in a virtual WG meeting.</p> <p>Evidence:</p> <p>Minutes of ninth WG meeting.</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
(b) telephone conference meeting(s) where there is a verbal yes/no vote,	Procedures	YES	<p>PEFC DK 008-3, 6: (...) The working group must deploy one or a combination of the following options in order to check whether there is any sustained opposition to significant issues from essential stakeholders:</p> <ul style="list-style-type: none"> • (...) a conference call where verbal yes/no indications are provided (...)” <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
	Process	YES	<p>Consensus on the final draft was found by the WG in a virtual WG meeting.</p> <p>Evidence:</p> <p>Minutes of ninth WG meeting.</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
(c) e-mail request to the working group for agreement or objection where the members provide a formal (written) response (vote),	Procedures	YES	<p>PEFC DK 008-3, 6: "(...) The working group must deploy one or a combination of the following options in order to check whether there is any sustained opposition to significant issues from essential stakeholders: (...)</p> <ul style="list-style-type: none"> • by email, where a request for approval or objections is sent to the working group and they are invited to submit a written response." <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
	Process	N/A	<p>Consensus on the final draft was found by the WG in a virtual WG meeting.</p> <p>Evidence:</p> <p>Minutes of ninth WG meeting.</p> <p>Assessment decision: N/A</p> <p>Justification: The benchmark requirement is not applicable.</p>
(d) combinations of these methods.	Procedures	YES	<p>PEFC DK 008-3, 6: "(...) The working group must deploy one or a combination of the following options in order to check whether there is any sustained opposition to significant issues from essential stakeholders: (...)"</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
	Process	N/A	<p>Consensus on the final draft was found by the WG in a virtual WG meeting.</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
		A	<p>Evidence:</p> <p>Minutes of ninth WG1 meeting.</p> <p>Assessment decision: N/A</p> <p>Justification: The benchmark requirement is not applicable.</p>
<p>6.4.6 Where a vote is used in decision-making, the standard-setting procedures shall determine and include decision-making thresholds that quantifies consensus. The threshold must be consistent with the consensus definition (refer to 3.1). However, a majority vote cannot override sustained opposition in order to achieve consensus.</p>	Procedures	NO	<p>PEFC DK 008-3, 6: “(...) Consensus must be reached on the content of the final drafts from the working group before they can be approved by the PEFC Denmark board.</p> <p>Consensus does not require unanimity, but according to the PEFC Council’s definition of consensus (section 3.1 of PEFC ST 1001:2018), there must be no sustained opposition to significant issues from essential stakeholders; and the process must seek to take into account the views of all parties, as well as attempting to resolve potential conflicts. 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. However, a majority vote cannot override sustained opposition in order to achieve consensus.”</p> <p>Assessment decision: Minor nonconformity</p> <p>Justification: The benchmark requires that a threshold for consensus is defined by the “standard setting procedures”, i.e., by DK 008-3. However, such a threshold does not seem to be defined by DK 008-3.</p>
	Process	YES	Voting was not used in the decision-making.

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
			<p>Approval was made by a statement on consensus from the Chair - there was no dissenting voices or hands (votes).</p> <p>The final draft was approved unanimously by the WG.</p> <p>Evidence: Minutes of ninth WG1 meeting.Assessment decision: Conformity</p> <p>Justification The benchmark requirement is met.</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 disputed issue within the working group,	Procedures	YES	<p>PEFC DK 008-3, 6: "(...) If there is sustained opposition to significant issues by essential stakeholders, the reasons for the oppositions must be justified and attempts must be made to resolve the point(s) of conflict in question by means of:</p> <p>a) discussion and negotiation within the working group in an attempt to find a compromise (...)"</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
	Process	YES	<p>PEFC Denmark comment: "There was no sustained opposition in the standard revision."</p> <p>Evidence: Minutes of WG meetings</p> <p>Assessment decision: Conformity</p> <p>Justification: Neither minutes nor stakeholder consultation and survey contradict</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
			PEFC Denmark's statement that there has been no sustained opposition in the standard revision process.
(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		<p>PEFC DK 008-3, 6: "(...) If there is sustained opposition to significant issues by essential stakeholders, the reasons for the oppositions must be justified and attempts must be made to resolve the point(s) of conflict in question by means of:</p> <p>(...) b) direct negotiation between the stakeholder/stakeholder who putting forward the opposition and stakeholders with conflicting views on the subject in question (...)."</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
	Process	YES	<p>PEFC Denmark comment: "There was no sustained opposition in the standard revision."</p> <p>Evidence: Minutes of WG meetings</p> <p>Assessment decision: Conformity</p> <p>Justification: Neither minutes nor stakeholder consultation and survey contradict PEFC Denmark's statement that there has been no sustained opposition in the standard revision process.</p>
(c) additional round(s) of public consultation (if necessary) where further stakeholder input can help to achieve	Procedures	YES	<p>PEFC DK 008-3, 6: "(...) If there is sustained opposition to significant issues by essential stakeholders, the reasons for the oppositions must be justified and attempts must be made to resolve the point(s) of conflict in question by means of:</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
consensus on unresolved issues. The standardising body determines the scope and duration of any additional public consultation.			<p>a) discussion and negotiation within the working group in an attempt to find a compromise</p> <p>b) direct negotiation between the stakeholder/stakeholder who putting forward the opposition and stakeholders with conflicting views on the subject in question</p> <p>c) an appeals mechanism, as described in section 10.</p> <p>d) an additional round(s) of public consultation (if necessary) where further stakeholder input can help to achieve consensus on unresolved issues. PEFC Denmark shall determines the scope and duration of any additional public consultation”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
	Process	YES	<p>PEFC Denmark comment: “There was no sustained opposition in the standard revision.”</p> <p>Evidence: Minutes of WG meetings</p> <p>Assessment decision: Conformity</p> <p>Justification: Neither minutes nor stakeholder consultation and survey contradict PEFC Denmark’s statement that there has been no sustained opposition in the standard revision process.</p>
6.4.8 When a substantial issue cannot be resolved and sustained opposition persists, the standardising body shall	Procedures	YES	PEFC DK 008-3, 6: “(...) If there is sustained opposition to significant issues by essential stakeholders, the reasons for the oppositions must be justified and

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
initiate dispute resolution in accordance with its procedures for impartial and objective action.			<p>attempts must be made to resolve the point(s) of conflict in question by means of:</p> <p>(...) c) an appeals mechanism, as described in section 10.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
	Process	YES	<p>PEFC Denmark comment: “There was no sustained opposition in the standard revision.”</p> <p>Evidence: Minutes of WG meetings</p> <p>Assessment decision: Conformity</p> <p>Justification: Neither minutes nor stakeholder consultation and survey contradict PEFC Denmark’s statement that there has been no sustained opposition in the standard revision process.</p>
6.5.1 The standardising body shall organise public consultation on the enquiry draft and shall ensure that:			
<p>(a) the start and the end dates of public consultation are announced in a timely manner through suitable media,</p> <p>NOTE <i>In a timely manner</i> means (at the latest) the day before the start of public consultation.</p>	Procedures	YES	<p>PEFC DK 008-3, 7: “(...) Drafts of new or revised standards that have been prepared in detail are sent for public consultation in an appropriate manner (via the website, newsletters, etc.) for a minimum of 60 days. The public consultation shall be communicated clearly and with at start and end date. (...)”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
	Process	YES	<p>The duration of the public consultation was clearly communicated.</p> <p>Evidence:</p> <p>https://pefc.dk/nyheder/offentlig-horing-af-pefc-danmarks-system</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
(b) a direct invitation to comment on the enquiry draft is sent to each stakeholder identified by stakeholder identification mapping (refer to 6.2) aiming for a balanced participation of stakeholder groups,	Procedures	YES	<p>PEFC DK 008-3, 7: "(...) Information on the consultation will be sent directly to all stakeholders identified as relevant at the start of the revision/development. Attempts must be made to reach any disadvantaged stakeholders and identified key stakeholders in the manner identified by the PEFC Denmark board in connection with the charting operation. (...) "</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
	Process	YES	<p>PEFC Denmark comment: "A letter was sent to all stakeholders."</p> <p>Evidence: Letter in "new documentation", "Invitation to public consultation - Invitation til høring af den 4"</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
	Procedures	YES	<p>PEFC DK 008-3, 7: "(...) Information on the consultation will be sent directly to all stakeholders identified as relevant at the start of the revision/development.</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	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,			<p>Attempts must be made to reach any disadvantaged stakeholders and identified key stakeholders in the manner identified by the PEFC Denmark board in connection with the charting operation. (...)"</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
	Process	YES	<p>PEFC Denmark comment: "A letter was sent to all stakeholders."</p> <p>Evidence: Letter in "new documentation", "Invitation to public consultation - Invitation til høring af den 4"</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
(d) the enquiry draft is made publicly available,	Procedures	YES	<p>PEFC DK 008-3, 7: "(...) Drafts of new or revised standards that have been prepared in detail are sent for public consultation in an appropriate manner (via the website, newsletters, etc.) for a minimum of 60 days."</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
	Process	YES	<p>The enquiry draft was made publicly available.</p> <p>Evidence:</p> <p>https://pefc.dk/nyheder/offentlig-horing-af-pefc-danmarks-system</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
			Assessment decision: Conformity Justification: The benchmark requirement is met.
(e) public consultation is for at least 60 days,	Procedures	YES	PEFC DK 008-3, 7: "(...) Drafts of new or revised standards that have been prepared in detail are sent for public consultation in an appropriate manner (via the website, newsletters, etc.) for a minimum of 60 days." Assessment decision: Conformity Justification: The benchmark requirement is met.
	Process	YES	The public consultation lasted 60 days. Evidence: https://pefc.dk/nyheder/offentlig-horing-af-pefc-danmarks-system Assessment decision: Conformity Justification: The benchmark requirement is met.
(f) all feedback is considered by the working group in an objective manner, and	Procedures	YES	PEFC DK 008-3, 7: "(...) The responses received must all be presented to the working group and discussed, and relevant comments must be incorporated. (...) " Assessment decision: Conformity Justification: The benchmark requirement is met.
	Process	YES	All feedback was considered by the working group in an objective manner.

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
			<p>Evidence:</p> <p>Development report, minutes, synopsis of comments</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
<p>(g) a synopsis of feedback is compiled for each material issue, including the outcome of considering the issue. The synopsis is made publicly available (e.g. on a website) and is sent to each stakeholder/party that gave feedback.</p> <p>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.</p>	Procedures	YES	<p>PEFC DK 008-3, 7: "(...) A summary of the comments received and the working groups' discussion of these comments must be published on the PEFC Denmark website. Information on this must be sent directly to the parties that have contributed responses to the consultation."</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
	Process	YES	<p>A synopsis of comments and their consideration was published on PEFC Denmark's website.</p> <p>PEFC Denmark comment: "All parties that commented in the public consultation was replied directly." Evidence:- https://www.pefc.dk/nyheder/offentlig-horing-af-pefc-danmarks-system</p> <p>- See "new ". See map "Reply public consultation"</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
6.5.2 For new standards the standardising body shall organise a second round of public consultation lasting at least 30 days.	Procedures	YES	<p>DK 008-03, Section 7:</p> <p>“(…) For new standards the standardizing body shall organize a second round of public consultation lasting at least 30 days.</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
	Process	N/A	<p>Assessment decision: N/A</p> <p>Justification: No new standard was developed</p>
<p>6.6 The standardising body shall organise pilot testing of new standard(s) to assess the clarity, auditability and feasibility of the requirements. The working group shall consider the outcome of pilot testing.</p> <p>NOTE Pilot testing is not required for revision of an existing standard when experience from its usage can substitute for pilot testing.</p>	Procedures	YES	<p>PEFC DK 008-3, 8: “When developing new standards, the standard must be tested by means of test certification before being submitted to the PEFC Council for approval.</p> <p>When revising standards, new elements must be tested in the field if the working group is of the opinion that earlier experience from certification is no substitute for this. Results from test certification and field tests must be published on the PEFC Denmark website. Experience from test certification and field testing must be incorporated into the final documents.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement</p>
	Process	N/A	<p>Assessment decision: N/A</p> <p>Justification: No new standard was developed</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
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	<p>PEFC DK 008-03, 4: “(...) The PEFC Denmark board must approve the developed and revised standards by a simple board majority in accordance with Article 5.6 of PEFC Denmark’s Articles of Association. (...)”</p> <p>PEFC DK 008-03, 6: “(...) Consensus must be reached on the content of the final drafts from the working group before they can be approved by the PEFC Denmark board. (...)”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
	Process	YES	<p>The PEFC board approved the standard based on evidence of consensus.</p> <p>Evidence:</p> <p>Development report, minutes, letter of application, note in standard</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
7.2.1 The formally approved standard(s)/normative document(s) shall be published and made publicly available at no cost within 14 days of approval, or as otherwise defined by the standardising body.	Procedures	YES	<p>PEFC DK 008-03, 4: “(...) To ensure transparency in the process: (...) all completed drafts and the final documents approved by the PEFC Denmark board, including the report describing the revision process, must be published on the PEFC Denmark website in good time. (...)”</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
			Assessment decision: Conformity Justification: The benchmark requirement is met.
	Process	YES	<p>Comment PEFC Denmark: "The board of PEFC Denmark will have a board meeting December 1th 2021 were changes to this procedure and all other standard will be finally approved. This will be annonced on the PEFC Denmark website: https://www.pefc.dk/nyheder/pefc-danmarks-nye-standarder"</p> Assessment decision: Conformity Justification: The benchmark requirement is met.
7.2.2 Standard(s) shall include:			
(a) identification and contact information for the standardising body,	Procedures	YES	<p>PEFC DK 008-03, Section 4: "All standard(s) in the Danish system shall include the following information: A. PEFC Denmark and contact information B. The Official language of the standard 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 D. The approval date and the date of next periodic review"</p> Assessment decision: Conformity Justification: The benchmark is met.
	Process	YES	<p>DK PEFC 001-4 front page includes PEFC Denmark contact information.</p> Assessment decision: Conformity

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
			Justification: The benchmark requirement is met.
(b) official language of the standard,	Procedures	YES	<p>PEFC DK 008-03, Section 4: "All standard(s) in the Danish system shall include the following information:</p> <p>A. PEFC Denmark and contact information</p> <p>B. The Official language of the standard</p> <p>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</p> <p>D. The approval date and the date of next periodic review"</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
	Process	YES	<p>DK PEFC 001-4 Copyright notice: "The official version of this document is in Danish, but it has been translated into English "</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
(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	<p>PEFC DK 008-03, Section 4: "All standard(s) in the Danish system shall include the following information:</p> <p>A. PEFC Denmark and contact information</p> <p>B. The Official language of the standard</p> <p>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</p> <p>D. The approval date and the date of next periodic review"</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
			Assessment decision: Conformity Justification: The benchmark requirement is met.
	Process	YES	DK PEFC 001-4 Copyright notice: “The only official version of this document is in English, but has been translated to Danish. In case of any doubt the English version is binding.” Assessment decision: Conformity Justification: The benchmark requirement is met.
(d) The approval date and the date of next periodic review 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.	Procedures	YES	PEFC DK 008-03, Section 4: “All standard(s) in the Danish system shall include the following information: A. PEFC Denmark and contact information B. The Official language of the standard 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 D. The approval date and the date of next periodic review” Assessment decision: Conformity Justification: The benchmark requirement is met.
	Process	YES	PEFC Denmark comment: “PEFC DK 008-03, Section 4: ...The Danish PEFC system must be revised at least every five years.” DK PEFC 001-4 includes its approval date.

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
			Assessment decision: Conformity Justification: The benchmark can be considered as essentially addressed.
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 DK 008-03, Section 1: "Printed copies of any standard in the Danish system will be made available upon request at a price that covers no more than administrative costs. Request can be send to PEFC Denmark, info@pefc.dk." Assessment decision: Conformity Justification: The benchmark requirement is met.
	Process	YES	DK PEFC 001-4 Copyright notice: "This document is freely available from the PEFC Denmark website or upon request." Assessment decision: Conformity Justification: The benchmark requirement is met.
7.2.4 The standardising body shall make the development report (refer to PEFC GD 1007) publicly available	Procedures	YES	DK PEFC 008-3, 9: "To ensure transparency in the process: <ul style="list-style-type: none"> • a report describing the revision process must be prepared at regular intervals in order to document compliance with the procedures • all completed drafts and the final documents approved by the PEFC Denmark board, including the report describing the revision process, must be published on the PEFC Denmark website in good time (...)." Assessment decision: Conformity

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
			Justification: The benchmark requirement is met.
	Process	YES	<p>The development rapport available on PEFC Denmark's website.</p> <p>Evidence:</p> <p>https://pefc.dk/search?q=development+report</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
Periodic review of standards			
8.1 The standard(s)/normative document(s) shall be reviewed at intervals that do not exceed a five-year period. The review shall be based on consideration of feedback received during the standard's implementation and a gap analysis. If necessary, a stakeholder consultation shall be organised to obtain further feedback and input.	Procedures	YES	<p>PEFC DK 008-3, 4: "(...) The Danish PEFC system must be revised at least every five years."</p> <p>Assessment decision: Conformity</p> <p>Justification: The standard setting procedures do not specify a mandatory review of the standard every five years, but a full revision. This meets the benchmark requirement sufficiently.</p>
	Process	YES	<p>The revision of the standard took place in line with PEFC International's extended endorsement period due to the revision of PEFC International Benchmark standards.</p> <p>Assessment decision: Conformity</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
			Justification: The benchmark requirement is met.
<p>8.2.1 The standardising body shall establish and maintain a permanent mechanism for collecting and recording feedback on a standard. This mechanism shall be accessible on the website of the standardising body and/or PEFC National Governing Body with clear directions for providing feedback.</p> <p>NOTE Feedback can be sent in various formats: comments, requests for clarification and/or interpretation, complaints, etc.</p>	Procedures	YES	<p>PEFC DK 008-03, Section 10: "For feedback mechanism the website of PEFC Denmark will provide direction and guide of how to provide feedback on standard and the Danish system. Feedback revised will be stored on PEFC Denmark online drive and sender of the feedback will get a reply that the feedback is received. Feedback is not only considered to be send by e-mail but can be in various form. Feedback shall be considered during revision of standards."</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
	Process	YES	<p>Feed-back mechanism: https://pefc.dk/om-pefc/pefc-organisationen/pefc-danmark/forslag-til-forbedringer-og-klager</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
8.2.2 All feedback received through all channels, including meetings, training courses, etc. shall be recorded and considered.	Procedures	YES	<p>PEFC DK 008-03, Section 10: "For feedback mechanism the website of PEFC Denmark will provide direction and guide of how to provide feedback on standard and the Danish system. Feedback revised will be stored on PEFC Denmark online drive and sender of the feedback will get a reply that the feedback is received. Feedback is not only considered to be send by e-mail but can be in various form. Feedback shall be considered during revision of standards."</p> <p>Assessment decision: Conformity</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
			Justification: The benchmark requirement is met.
	Process	YES	<p>PEFC Denmark comment: "Before the revision all comments and feed-back was presented to the working group. See map "new documentation" First meeting working group 1 and 2 - Fællesmøde PP</p> <p>Feed-back system: https://pefc.dk/om-pefc/pefc-organisationen/pefc-danmark/forslag-til-forbedringer-og-klager"</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
8.3.1 At the start of a review, the standardising body shall evaluate the standard against appropriate PEFC International standards, national laws and regulations, and other relevant standards to identify potential gaps in the standard.	Procedures	YES	<p>PEFC DK 008-03, Section 4: "At the start of a review, PEFC Denmark 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> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
	Process	YES	<p>PEFC Denmark comment: "To identify the relevant issues the working group had a presentation by Christian Rabeck, who worked as an auditor.</p> <p>Palle Madsen was chosen to be facilitator of working group one - he would contribute with the latest scientific knowledge and legislation because of his background as a professor on University of Copenhagen.</p> <p>Beside this the document was review and part of the public consultation.</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
			<p>https://cdn.pefc.org/preview.pefc.dk/media/2020-12/572ee637-6fab-42c6-9aef-301e15f1c114/f8722395-213b-5b26-bde1-6fbfd8effc64.pdf</p> <p>In working group 1 the climate perspective was disused and this was added to and have a more central part of the SFM standard - Skovstandard - PEFC DK 001-4”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement can be considered as covered.</p>
8.3.2 The standardising body shall consider the latest scientific knowledge, research and relevant emerging issues.	Procedures	YES	<p>PEFC DK 008-03, Section 4: “(...) Latest scientific knowledge, research and relevant emerging issues shall be considered. (...)”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
	Process	YES	<p>PEFC Denmark comment: “To identify the relevant issues the working group had a presentation by Christian Rabeck, who worked as an auditor.</p> <p>Palle Madsen was chosen to be facilitator of working group one - he would contribute with the latest scientific knowledge and legislation because of his background as a professor on University of Copenhagen.</p> <p>Beside this the document was review and part of the public consultation.</p> <p>https://cdn.pefc.org/preview.pefc.dk/media/2020-12/572ee637-6fab-42c6-9aef-301e15f1c114/f8722395-213b-5b26-bde1-6fbfd8effc64.pdf</p> <p>In working group 1 the climate perspective was disused and this was added to and</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
			<p>have a more central part of the SFM standard - Skovstandard - PEFC DK 001-4”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement can be considered as covered.</p>
<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.</p>	Procedures	YES	<p>PEFC DK 008-03, 4: “(...) The Danish PEFC system must be revised at least every five years. (...)”</p> <p>Assessment decision: Conformity</p> <p>Justification: As a periodic revision is required every five years, the benchmark requirement can be considered as met.</p>
	Process	N/A	<p>Assessment decision: N/A</p> <p>Justification: The forest management standard was revised.</p>
<p>8.4.2 At the start of a review, the standardising body shall update the stakeholder identification mapping (refer to clause 6.2).</p>	Procedures	YES	<p>PEFC DK 008-3, 5: “(...) The stakeholder groups are defined by the PEFC Denmark board prior to the appointment of the working groups on the basis of charting of stakeholders that is relevant to the task in question. Stakeholder groups must be based on the UN definitions of ‘stakeholder’, see Agenda 21, Rio Convention. This charting operation must identify any disadvantaged stakeholders and key stakeholder groups and their primary interests in the group, as well as how best to reach the various groups. The composition of the group will be dependent on the areas and tasks to be undertaken by the group. (...)”</p> <p>Assessment decision: Conformity</p> <p>Justification: As a periodic revision including new stakeholder mapping is required</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
			every five years, the benchmark requirement can be considered as met.
	Process	YES	<p>A stakeholder mapping was carried out as part of the revision.</p> <p>Evidence:</p> <p>Development report, stakeholder map, WG composition</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
8.4.3 The standardising body shall organise:			
(a) a public consultation period of at least 30 days (following the requirements of clause 6.5.1) and/or,	Procedures	N/ A	<p>PEFC Denmark comment: "Not relevant – no review made. PEFC Denmark board will change PEFC DK 008-03, when a review is relevant"</p> <p>Assessment decision: N/A</p> <p>Justification: As a revision of the standard is required every five years, the benchmark requirement for a public consultation as part of a periodic review, determining whether a revision is necessary or not, can be considered as not applicable.</p>
	Process	N/ A	<p>PEFC Denmark comment: Not relevant – no review made. PEFC Denmark board will change PEFC DK 008-03, when a review is relevant</p> <p>Assessment decision: N/A</p> <p>Justification: As a revision of the standard took place, the benchmark requirement</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
			for a public consultation as part of a periodic review, determining whether a revision is necessary or not, can be considered as not applicable.
(b) stakeholder meetings.	Procedures	N/ A	<p>PEFC Denmark comment: “Not relevant – no review made. PEFC Denmark board will change PEFC DK 008-03, when a review is relevant”</p> <p>Assessment decision: N/A</p> <p>Justification: As a revision of the standard is required every five years, the benchmark requirement for stakeholder meetings as part of a periodic review, determining whether a revision is necessary or not, can be considered as not applicable.</p>
	Process	N/ A	<p>PEFC Denmark comment: Not relevant – no review made. PEFC Denmark board will change PEFC DK 008-03, when a review is relevant</p> <p>Assessment decision: N/A</p> <p>Justification: As a revision of the standard took place, the benchmark requirement for stakeholder meetings as part of a periodic review, determining whether a revision is necessary or not, can be considered as not applicable.</p>
8.4.4 The standardising body shall announce the review in a timely manner (refer to 6.3).	Procedures	N/ A	<p>PEFC Denmark comment: “Not relevant – no review made. PEFC Denmark board will change PEFC DK 008-03, when a review is relevant”</p> <p>Assessment decision: N/A</p> <p>Justification: As a revision of the standard is required every five years, the benchmark requirement for the announcement of a review can be considered as</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
			not applicable.
	Process	N/ A	<p>PEFC Denmark comment: Not relevant – no review made. PEFC Denmark board will change PEFC DK 008-03, when a review is relevant</p> <p>Assessment decision: N/A</p> <p>Justification: As a revision of the standard took place, the benchmark requirement for the announcement of a review can be considered as not applicable.</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	N/ A	<p>PEFC Denmark comment: "Not relevant – no review made. PEFC Denmark board will change PEFC DK 008-03, when a review is relevant"</p> <p>Assessment decision: N/A</p> <p>Justification: As a revision of the standard is required every five years, the benchmark requirement for an evaluation whether a revision is necessary or not can be considered as not applicable.</p>
	Process	N/ A	<p>PEFC Denmark comment: Not relevant – no review made. PEFC Denmark board will change PEFC DK 008-03, when a review is relevant</p> <p>Assessment decision: N/A</p> <p>Justification: As a revision of the standard took place, the benchmark requirement for an evaluation whether a revision is necessary or not can be considered as not applicable.</p>
8.5.2 The decision shall be made at the highest decision-making level of the standardising body	Procedures	N/ A	<p>PEFC Denmark comment: "Not relevant – no review made. PEFC Denmark board will change PEFC DK 008-03, when a review is relevant"</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
			<p>Assessment decision: N/A</p> <p>Justification: As a revision of the standard is required every five years, the benchmark requirement for the decision whether a revision is necessary or not to be made at highest level of the standardising body can be considered as not applicable.</p>
	Process	N/A	<p>PEFC Denmark comment: Not relevant – no review made. PEFC Denmark board will change PEFC DK 008-03, when a review is relevant</p> <p>Assessment decision: N/A</p> <p>Justification: As a revision of the standard took place, the benchmark requirement for the decision whether a revision is necessary or not to be made at highest level of the standardising body can be considered as not applicable.</p>
8.5.3 Where the decision is to reaffirm a standard, the standardising body shall provide a justification for the decision and make the justification publicly available.	Procedures	N/A	<p>PEFC Denmark comment: “Not relevant – no review made. PEFC Denmark board will change PEFC DK 008-03, when a review is relevant”</p> <p>Assessment decision: N/A</p> <p>Justification: As a revision of the standard is required every five years, the benchmark requirement concerning the reaffirmation of an unamended standard can be considered as not applicable.</p>
	Process	N/A	<p>PEFC Denmark comment: Not relevant – no review made. PEFC Denmark board will change PEFC DK 008-03, when a review is relevant</p> <p>Assessment decision: N/A</p> <p>Justification: As a revision of the standard took place, the benchmark requirement</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
			concerning the reaffirmation of an unamended standard can be considered as not applicable.
8.5.4 Where the decision is to revise the standard, the standardising body shall specify the type of revision (normal or editorial revision).	Procedures	N/A	<p>PEFC Denmark comment: “Not relevant – no review made. PEFC Denmark board will change PEFC DK 008-03, when a review is relevant”</p> <p>Assessment decision: N/A</p> <p>Justification: As a normal revision of the standard is required every five years, the benchmark requirement concerning determining whether a review should be editorial or “normal” can be considered as not applicable.</p>
	Process	YES	<p>PEFC Denmark comment: Not relevant – no review made. PEFC Denmark board will change PEFC DK 008-03, when a review is relevant</p> <p>Assessment decision: Conformity</p> <p>Justification: PEFC Denmark made the decision to carry out a normal revision.</p>
Revision of standards			
<p>9.1 Procedures for revision of standard(s)/normative document(s) shall conform to those stated in section 6.</p> <p>A normal revision can occur at the periodic review, or between periodic reviews, but does not include editorial revisions and time-critical revisions.</p>	Procedures	YES	<p>PEFC DK 008-03, 2: “This document describes the procedures for the development and revision of standards pursuant to the Danish PEFC certification system. The procedures must [be] used for the revisions every five years and when developing new standards pursuant to the Danish system.”</p> <p>Assessment decision: Conformity</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
			Justification: The benchmark requirement is met.
	Process	YES	<p>The standard revision process followed the standard setting procedures which are intended to meet the requirements of PEFC ST 1001:2017, section 6.</p> <p>Evidence:</p> <p>Development report, reference documentation</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
9.2 Editorial revisions can be made without triggering the normal revision process. The standardising body shall approve the editorial changes formally and publish an amendment or a new edition of the standard.	Procedures	YES	<p>PEFC DK 008-03, Section 4: "PEFC Denmark can make editorial revisions. The changes shall be formally approved by the PEFC Denmark board, and an amendment or new edition of the standard shall be published on PEFC Denmark website."</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
	Process	N/A	<p>Assessment decision: N/A</p> <p>Justification: A normal revision was carried out.</p>
9.3.1 A time-critical revision is a revision between two periodic reviews using a fast-track process.	Procedures	YES	<p>PEFC DK 008-03, Section 4: "PEFC Denmark can conduct a time-critical revision, which is a revision between two periodic reviews using a fast-track process."</p> <p>Assessment decision: Conformity</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
			Justification: The benchmark requirement is met.
	Process	N/ A	Assessment decision: N/A Justification: A normal revision was carried out.
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 DK 008-03, Section 4: "A. Change in national laws and regulations affecting compliance with PEFC International requirements" Assessment decision: Conformity Justification: The benchmark requirement is met.
	Process	N/ A	Assessment decision: N/A Justification: A normal revision was carried out.
(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 DK 008-03, Section 4: "B. Instruction by PEFC International to comply with specific or new PEFC requirements within a timescale that is too short for a normal revision" Assessment decision: Conformity Justification: The benchmark requirement is met.
	Process	N/ A	Assessment decision: N/A

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
			Justification: A normal revision was carried out.
9.3.3 The time-critical revision shall follow these steps:			
(a) The standardising body shall draft the revised standard,	Procedures	YES	PEFC DK 008-03, Section 4: "The fast-track process when a time-critical revision is conducted the following these steps shall be followed A. PEFC Denmark shall draft the revised standard" Assessment decision: Conformity Justification: The benchmark requirement is met.
	Process	N/A	Assessment decision: N/A Justification: A normal revision was carried out.
(b) The standardising body may consult stakeholders, but it is not mandatory,	Procedures	YES	PEFC DK 008-03, Section 4: "B. PEFC Denmark may consult stakeholders, but it is not mandatory" Assessment decision: Conformity Justification: The benchmark requirement is met.
	Process	N/A	Assessment decision: N/A Justification: A normal revision was carried out.
	Procedures	YES	PEFC DK 008-03, Section 4: "C. The revised standard shall be approved formally by

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
(c) The revised standard shall be approved formally at the highest appropriate decision-making level of the standardising body,			<p>PEFC Denmark”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
	Process	N/ A	<p>Assessment decision: N/A</p> <p>Justification: A normal revision was carried out.</p>
(d) The standardising body shall explain the justification for the urgent change(s) and make the justification publicly available.	Procedures	YES	<p>PEFC DK 008-03, Section 4: “D. The standardizing body shall explain the justification for the urgent change(s) and make the justification publicly available on PEFC Denmarks website”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
	Process	N/ A	<p>Assessment decision: N/A</p> <p>Justification: A normal revision was carried out.</p>
9.4.1 A revision shall define the application date and transition period of the revised standard(s)/normative document(s).	Procedures	YES	<p>PEFC DK 008-03, Section 4: “PEFC Denmark shall define the application date and transition period of the revised standard(s) or normative document(s). The application date shall not be more than one year after the publication of the standard.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
	Process	YES	<p>PEFC Denmark comment: "Published on PEFC Denmark's homepage: "Transition period, for existing forest certificates, the revised standards must be implemented within one year after the changes are approved by the PEFC Council."</p> <p>https://www.pefc.dk/nyheder/pefc-danmarks-nye-standarder</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
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	<p>PEFC DK 008-03, Section 4: "PEFC Denmark shall define the application date and transition period of the revised standard(s) or normative document(s). The application date shall not be more than one year after the publication of the standard."</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
	Process	YES	<p>PEFC Denmark comment: "Published on PEFC Denmark's homepage: "Transition period, for existing forest certificates, the revised standards must be implemented within one year after the changes are approved by the PEFC Council."</p> <p>https://www.pefc.dk/nyheder/pefc-danmarks-nye-standarder</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
9.4.3 The transition period shall not exceed one year. The standardising body may determine a longer period when	Procedures	YES	<p>PEFC DK 008-03, Section 4: "The transition period shall not exceed one year. The PEFC Denmark board may determine a longer period when justified by exceptional</p>

PEFC benchmark requirement	Assess. basis*	YES /N O	Reference to system documentation (including quotation of relevant text)
justified by exceptional circumstances.			<p>circumstances.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
	Process	YES	<p>PEFC Denmark comment: “Published on PEFC Denmark’s homepage: “Transition period, for existing forest certificates, the revised standards must be implemented within one year after the changes are approved by the PEFC Council.””</p> <p>https://www.pefc.dk/nyheder/pefc-danmarks-nye-standarder</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>

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

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
Context of the national standard and the organisations applying a PEFC endorsed standard		
4.1 General		
The requirements for sustainable forest management defined by regional, national or sub-national forest management standards shall:		
<p>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;</p> <p>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.</p>	Yes	<p>PEFC DK 001-4, chapter 2: "The standard must be implemented on the forest property in question by means of:</p> <ul style="list-style-type: none"> - Individual certification of the forest property, or - Group certification through a group" <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
<p>b) be clear, performance based and auditable;</p>	Yes	<p>PEFC DK 001-4, chapter 6: "The objective of the Danish PEFC Forest Management Standard is to promote sustainable development and management of Danish forests through the certification of forests, taking into account economic, ecological and social aspects in forest management.</p> <p>For this purpose, PEFC Denmark's Forest Management Standard is divided into five main sections. Detailed criteria with which certified forests are to comply are described for each main section."</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>Assessment decision: Conformity</p> <p>Justification: In the view of the assessor, the requirements of the standard can be considered as clear, performance based and auditable.</p>
c) apply to activities of all forest operators in the defined forest area who have an impact on achieving compliance with the requirements;	YES	<p>PEFC DK 001-4, chapter 6 & 4.6:</p> <p>Chapter 6: "The standard must be implemented on the forest property in question by means of:</p> <ul style="list-style-type: none"> - Individual certification of the forest property, or - Group certification through a group." <p>"4.6 The forest owner must ensure that employees have the necessary instructions or qualifications to perform their duties in a safe and qualified manner and comply with the applicable forest management guidelines as well as legislation, including health and safety legislation. The forest owner can also use contracts to ensure that the contractor is able to document this."</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement can be considered as being sufficiently addressed.</p>
d) require record-keeping that provides evidence of compliance with the requirements of the forest management standards;	YES	<p>PEFC DK 001-4, 5.2-5.5</p> <p>"5.2 Preliminary records</p> <p>As an introduction to certification, a number of records must be prepared and updated regularly. The written documentation for the forest property must be available to the certification body responsible for conducting the audit. This</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>documentation may be in the form of an IT-based planning system, an existing management plan, a green management plan or similar. The written documentation must include the following: (...)”</p> <p>5.3 Current records</p> <p>The forest owner must regularly supervise forest management, which includes preparing documented management records that clearly refer to the division of the forest map: (...)</p> <p>5.4</p> <p>Records of events, excursions and meetings held and written requests from users and other external parties. Complaints received and the outcome of their processing are recorded and archived for at least five years (see criterion 4.11).</p> <p>5.5</p> <p>Records of observed damage caused by external factors, plus an evaluation of their effect of these on forest management.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
<p>e) specify “100% PEFC certified”, or another system specific claim, as claim to be used to communicate the origin of products in an area covered by the standard to customers with a PEFC chain of custody;</p> <p>Note: System specific claims of PEFC endorsed standards and PEFC Council approved abbreviations of such claims and the</p>	NO	<p>PEFC DK 001-4, 5.7: “If products from the forest are sold as certified, the following information as a minimum must be provided by invoice, delivery note or log tally for each delivery: (...) Certificate number, any PEFC trademark and a “100% PEFC-certified” declaration or other relevant statement”</p> <p>Assessment decision: Minor nonconformity</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
claim “100% PEFC certified”, and their translations into languages other than English, are published online on the PEFC website www.pefc.org .		<p>Justification: The SFM standard of PEFC Denmark specifies that the claim “100% PEFC certified” is used to communicate the origin of products in an area covered by the standard.</p> <p>However, it is not clear what is referred to with “or other relevant statement”.</p> <p>Furthermore, PEFC DK 001-4, 1.5 states that “The products from the intensively managed areas cannot be sold as PEFC-certified unless specified otherwise.” It is unclear what “unless specified otherwise” entails.</p> <p>Therefore, there is a risk that undetermined claims other than “100% PEFC certified” are used and that material which does not qualify for a PEFC claim is covered by a PEFC claim. Hence, the benchmark requirement cannot be considered as sufficiently addressed yet.</p>
f) require that where owners/managers of forests are selling products from areas other than covered by the standard, only products from areas covered by the standard are sold with the claim “100% PEFC-certified” or a system specific claim;	YES	<p>PEFC DK 001-4, 5.6, 5.7, 5.8:</p> <p>“5.6 Sale of certified wood</p> <p>The forest owner decides whether or not the products from the certified area are sold as certified. The forest owner must actively sell the wood as certified so that the buyer (be it a sawmill, a timber trader or other) may include it as certified under their chain of custody certification (see Chain of Custody of Forest and Tree Based Products – Requirements – PEFC ST 2002:2020).</p> <p>5.7 If products from the forest are sold as certified, the following information as a minimum must be provided by invoice, delivery note or log tally for each delivery:</p> <ul style="list-style-type: none"> ▪ The name of forest, as stated on the certificate

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<ul style="list-style-type: none"> ▪ Which products are included ▪ Quantity of products delivered ▪ Delivery date/period ▪ Formal declaration that the products are certified ▪ Certificate number, any PEFC trademark and a “100% PEFC-certified” declaration or other relevant statement” <p>5.8 Chain of custody (only applicable to partial certification of a forest property):</p> <p>Forest owners who choose to certify only part of their forest property must be able to document the chain of custody for the products sold as PEFC-certified. It must be possible to document the following as a minimum:</p> <p>a) The forest owner must ensure that the certified raw material is separated or clearly identifiable at all stages of the production or trading process.</p> <p>b) That the buyer is provided with documentation on sale or transfer of certified material that verifies compliance with the chain of custody requirements in Chain of Custody of Forest and Tree Based Products – Requirements – PEFC ST 2002:2020</p> <p>c) The forest owner must ensure that documentation of the certified products delivered for each delivery contains the following information as a minimum, by invoice, delivery note or log tally:</p> <p>- The name of forest, as stated on the certificate</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<ul style="list-style-type: none"> - Which products are included - Quantity of products delivered - Delivery date/period - Formal declaration that the products are certified - Certificate number, any logo licence code and a “100% PEFC-certified” declaration or other relevant statement. <p>d) That a person has been appointed who, regardless of other responsibilities, is to have overall responsibility and authority over the chain of custody.</p> <p>e) The forest owner must keep a record of all forest-based products sold and their alleged origin in order to provide evidence of compliance with the requirements and the effective functioning of verification of the chain of custody. The organisation must keep these records for at least five years.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
g) require that claims on the origin of products in an area covered by the standard are only made by forest owners/managers covered by a PEFC recognised certificate issued against the standard;	Yes	<p>PEFC DK 001-4, 5.6, 5.7, 5.8 (see above)</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
h) specify requirements concerning the information which need to be provided to a PEFC chain of custody certified	Yes	<p>PEFC DK 001-4, 5.7:</p> <p>If products from the forest are sold as certified, the following information as a</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
customer;		<p>minimum must be provided by invoice, delivery note or log tally for each delivery: (...)</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</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 DK 001-4, chapter 5: "By signing the agreement, the forest owner undertakes to accept and comply with the following obligations:</p> <p>(...) 2) Relevant legislation and provisions regulating forest management in Denmark. A minimum list of relevant legislation can be found in <i>Annex 1 – Relevant Danish legislation, as well as ILO conventions</i>"</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</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 DK 001-4, 5.2: "5.2 Preliminary records - As an introduction to certification, a number of records shall be prepared and updated regularly. The written documentation for the forest property shall be available to the certification body responsible for conducting the audit. This documentation may be in the form of an IT-based planning system, an existing management plan, a green management plan or similar. The written documentation shall include the following: (...) I) Identification of relevant stakeholders and their needs and expectations in relation to the forest"</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Assessment decision: Conformity Justification: The benchmark requirement is met.
b) the relevant needs and expectations of these stakeholders.	YES	<p>PEFC DK 001-4, 5.2: "5.2 Preliminary records - As an introduction to certification, a number of records shall be prepared and updated regularly. The written documentation for the forest property shall be available to the certification body responsible for conducting the audit. This documentation may be in the form of an IT-based planning system, an existing management plan, a green management plan or similar. The written documentation shall include the following: (...) I) Identification of relevant stakeholders and their needs and expectations in relation to the forest"</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
4.3 Determining the scope of the management system		
4.3.1 The standard requires that the organisation shall determine the boundaries and applicability of the management system to establish its scope.	YES	<p>PEFC DK 001-4, 4 5: "Properties shall formulate and maintain a forest planning system and management system appropriate to the size and use of the forest so as to assess the social, environmental and economic impact on forest management. The planning system shall include a cycle of calculations and planning, implementation, monitoring and evaluation as described below. The management system shall describe the organisational structure, planned activities, distribution of responsibilities, practices, procedures, methods and resources to develop, implement, achieve, review, maintain and improve described policies and criteria"</p> <p>Assessment decision: Conformity</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Justification: The benchmark requirement is met.
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	<p>PEFC DK 001-4, chapter 6: "Forest management must form a cycle of registrations and planning, implementation, monitoring and evaluation which makes it possible to assess the social, environmental and economic impact on forest management. Therefore, the standard includes a number of requirements for registration and documentation which must form a basis for this evaluation. It is also the basis for a correct and simple audit of forest management and ensures high levels of credibility and quality for any PEFC certification."</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
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	<p>PEFC DK 001-4, chapter 5: "Certification of forest management is confirmed by an agreement between the forest owner and the certification body/group leader, and shall be valid for a minimum of one year.</p> <p>By signing the agreement, the forest owner undertakes to accept and comply with the following obligations:</p> <ol style="list-style-type: none"> 1) PEFC Denmark's Forest Management Standard 2) Relevant legislation and provisions regulating forest management in Denmark. A minimum list of relevant legislation can be found in <i>Annex 1 – Relevant Danish legislation, as well as ILO conventions</i>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>3) Control through third-party auditing by a certification body.</p> <p>The forest owner must be able to document ownership of the areas included in the certification. If this is a matter of dispute, ownership can be documented via <i>the Public Information Server</i>⁵ (OIS) or via a land certificate from the Land Registry.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
b) to continuously improve the sustainable forest management system.	YES	<p>PEFC DK 001-4 “5. Properties shall formulate and maintain a forest planning system and management system appropriate to the size and use of the forest so as to assess the social, environmental and economic impact on forest management. The planning system shall include a cycle of calculations and planning, implementation, monitoring and evaluation as described below. The management system shall describe the organisational structure, planned activities, distribution of responsibilities, practices, procedures, methods and resources to develop, implement, achieve, review, maintain and improve described policies and criteria”</p> <p>“5.3 The forest owner shall conduct a management review at least once a year, which shall include:</p> <ul style="list-style-type: none"> a) Information from results in audits, observations, nonconformities and corrective actions b) The status of actions from previous management reviews c) Opportunities for continual improvement d) Any need for changes to the management system.”

⁵ <https://www.ois.dk/default.aspx>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement can be considered as being essentially addressed.</p>
5.2 The standard requires that this commitment shall be publicly available.	Yes	<p>See above</p> <p>Assessment decision: Conformity</p> <p>Justification: While the standard itself does not require that the commitment/agreement is publicly available, sites/members covered by PEFC forest management certification are publicly listed on the PEFC International website (https://pefc.org/find-certified). This can be considered as addressing the essence of the benchmark requirement to a sufficient extent.</p>
5.3 The standard requires that responsibilities for sustainable forest management shall be clearly defined and assigned.	Yes	<p>PEFC DK 001-4, 4.6, 5.2, 5.8:</p> <p>“4.6 The forest owner must ensure that employees have the necessary instructions or qualifications to perform their duties in a safe and qualified manner and comply with the applicable forest management guidelines as well as legislation, including health and safety legislation. The forest owner can also use contracts to ensure that the contractor is able to document this.”</p> <p>“5.2 (...) The written documentation must include the following: (...) b) Allocation of responsibilities and described procedures for creating and updating all documents and records required pursuant to this standard (...).”</p> <p>“5.8 (...). It must be possible to document the following as a minimum: (...) d) That a person has been appointed who, regardless of other responsibilities, is to have overall responsibility and authority over the chain of custody.”</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Assessment decision: Conformity Justification: The benchmark requirement is met.
6. Planning		
6.1 Actions to address risks and opportunities		
6.1.1 The standard requires that the organisation shall consider risks and opportunities concerning compliance with the requirements for sustainable forest management. Size and scale of the operations of the organisation shall be considered.	Yes	<p>PEFC DK 001-4, 5.1: "Management objectives The forest owner must define an objective for sustainable forest management that is compliant with the standard and that relates to management opportunities and limitations given the size and extent of forest management.</p> <p>The objective must include:</p> <ul style="list-style-type: none"> ▪ An overall objective for the forest property ▪ All relevant objectives, goals and targets for forest management" <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement can be considered as met.</p>
6.1.2 The standard requires that inventory and mapping of forest resources shall be established and maintained, adequate to local and national conditions and in correspondence with the requirements described in this international benchmark standard.	Yes	<p>PEFC DK 001-4, 5.2: "As an introduction to certification, a number of records must be prepared and updated regularly. (...) The written documentation must include the following:</p> <p>e) A forest map showing the certified areas. The requirements for the forest map are as follows:</p> <ul style="list-style-type: none"> ▪ The boundaries of the certified areas must be indicated ▪ It must provide a reasonable overview of the division of the forest into forest types or stands, as well as roads and major paths. The individual sub-areas are numbered according to the compartment/sub-compartment system, for example

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<ul style="list-style-type: none"> ▪ Each sub-area is described with the following data as a minimum: <ul style="list-style-type: none"> ▪ Area ▪ Main tree species ▪ Significant associated species ▪ Age or year of establishment (based on professional judgement, if necessary) ▪ Land use of areas without tree cover (...) f) Determination of the average annual allowable felling during the period. The level of detail of the determination must be in reasonable proportion to the size and management objectives of the forest property in question, but as a minimum it must be based on a forest level, estimated total tree volume and growth, possibly based on the regional records for tree volume and growth of the forest by Copenhagen University's forest statisticians g) These records relate to maps of forests that are naturally of particular value and areas with high natural preservation value: (...) h) The records also relate to maps of: <ul style="list-style-type: none"> a. Any areas with drinking water interests designated by the municipality b. Historic sites and cultural relics registered with the authorities c. Forest access (roads and major paths) as well as special facilities for recreational activities (such as fire pits, basic campsites, forest playgrounds, scenic views, parking areas, etc.) d. Areas allocated to intensive management systems i) A maintenance plan for biodiversity areas that includes as a minimum: <ul style="list-style-type: none"> a. The purpose of the designated area b. Timescale c. Protection concerns d. Necessary maintenance measures"

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Assessment decision: Conformity Justification: The benchmark requirement can be considered as met.
6.2 Management plan		
6.2.1 The standard requires that management plans shall be:		
a) elaborated and periodically updated or continually adjusted;	Yes	PEFC DK 001-4, 5: "Planning - Properties must formulate and maintain a forest planning system appropriate to the size and use of the forest (...)" Assessment decision: Conformity Justification: The benchmark requirement is met
b) appropriate to the size and use of the forest area;	Yes	PEFC DK 001-4, 5: "Planning - Properties must formulate and maintain a forest planning system appropriate to the size and use of the forest (...)" Assessment decision: Conformity Justification: The benchmark requirement is met
c) based on applicable local, national and international legislation as well as existing land-use or other official plans; and	Yes	PEFC DK 001-4, 5 & chapter 5: "5. (...) Available knowledge and data from research institutions, forest monitoring and other advisory services, as appropriate, must be used in the planning process, and the grant schemes aimed at forestry that promote forest policies must be considered." Chapter 5: "By signing the agreement, the forest owner undertakes to accept and comply with the following obligations: (...) 2) Relevant legislation and provisions regulating forest management in Denmark. A minimum list of relevant legislation can be found in Annex 1 – Relevant Danish legislation, as

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>well as ILO conventions”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
d) adequately covering forest resources.	Yes	<p>PEFC DK 001-4, 5.2 “The written documentation must include the following: (...) e) A forest map showing the certified areas. The requirements for the forest map are as follows: (...) Each sub-area is described with the following data as a minimum:</p> <ul style="list-style-type: none"> - Area - Main tree species - Significant associated species - Age or year of establishment (based on professional judgement, if necessary) - Land use of areas without tree cover <p>f) Determination of the average annual allowable felling during the period. The level of detail of the determination must be in reasonable proportion to the size and management objectives of the forest property in question, but as a minimum it must be based on a forest level, estimated total tree volume and growth, possibly based on the regional records for tree volume and growth of the forest by Copenhagen University’s forest statisticians</p> <p>g) These records relate to maps of forests that are naturally of particular value and areas with high natural preservation value:</p> <ul style="list-style-type: none"> - Designated biodiversity areas, including undisturbed forest - Registered conservation areas, as well as areas compliant with Article 3 of the Nature Conservation Act, and possibly mapped Natura 2000 habitats registered with the authorities. - Other natural values (key habitats) - Possibly areas with native species that must not be converted to non-native

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>species (see criterion 1.11)</p> <p>h) The records also relate to maps of:</p> <ul style="list-style-type: none"> - Any areas with drinking water interests designated by the municipality - Historic sites and cultural relics registered with the authorities - Forest access (roads and major paths) as well as special facilities for recreational activities (such as fire pits, basic campsites, forest playgrounds, scenic views, parking areas, etc.) <p>(...)</p> <p>k) Guidelines, where applicable, for the utilisation of other forest products”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</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 DK 001-4, 5.2 (see above)</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met</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 DK 001-4, 5.1, 5.2:</p> <p>“5.1 Management objectives - The forest owner must define an objective for sustainable forest management that is compliant with the standard and that relates to management opportunities and limitations given the size and extent of forest management. The objective must include:</p> <ul style="list-style-type: none"> - An overall objective for the forest property, - All relevant objectives, goals and targets for forest management

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>“5.2 (...) The written documentation must include the following:</p> <p>a) Objective of forest management (...) e) A forest map showing the certified areas. (...) f) Determination of the average annual allowable felling during the period. The level of detail of the determination must be in reasonable proportion to the size and management objectives of the forest property in question, but as a minimum it must be based on a forest level, estimated total tree volume and growth, possibly based on the regional records for tree volume and growth of the forest by Copenhagen University’s forest statisticians”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
6.2.4 The standard requires that the annually allowable use of non-wood forest products shall be included in the management plan where forest management covers commercial use of non-wood forest products at a level which can have an impact on their long-term sustainability.	YES	<p>PEFC DK 001-4, 5.2, 1.4</p> <p>“5.2 (...) The written documentation must include the following: (...) k) Guidelines, where applicable, for the utilisation of other forest products (see criterion 1.4)”</p> <p>“1.4 Forest resources – both wood and non-wood products – must be utilised in a way that does not affect the long-term soil capability. For the production of wood, this is ensured through compliance with the other requirements stipulated in this standard. If non-wood products are to be utilised commercially, the owner must establish management guidelines so as to ensure that this does not affect the long-term cultivation potential capability.</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
6.2.5 The standard requires that management plans specify ways and means to minimise the risk of degradation and damage to forest ecosystems.	Yes	<p>PEFC DK 001-4, 1.1: "(...) Management must also be structure in order to minimise the risk of degradation and damage to forest ecosystems.</p> <p>1.1.1.1 Evaluation of the owner's policy and objective</p> <p>1.1.1.2 Planning as described in section 5 is complete"</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
6.2.6 The standard requires that management plans shall take into account the results of scientific research.	Yes	<p>PEFC DK 001-4, 5: "(...) Available knowledge and data from research institutions, forest monitoring and other advisory services, as appropriate, must be used in the planning process, and the grant schemes aimed at forestry that promote forest policies must be considered."</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
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	<p>PEFC DK 001-4, 5.2: "d) A summary or the entire management plan must be made publicly available upon request. Confidential business information is exempt from the disclosure requirement, as is information on specific cultural or natural values that need protection."</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
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	Yes	<p>PEFC DK 001-4, 5.2: "d) A summary or the entire management plan must be made publicly available upon request. Confidential business information is exempt from the disclosure requirement, as is information on specific cultural or</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
made confidential by applicable legislation or for the protection of cultural sites or sensitive natural resource features.		<p>natural values that need protection.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
6.3 Compliance requirements		
6.3.1 Legal compliance		
<p>6.3.1.1 The standard requires that the organisation shall identify and have access to the legislation applicable to its forest management and determine how these compliance obligations apply to the organisation.</p> <p>Note: For a country which has signed a FLEGT Voluntary Partnership Agreement (VPA) between the European Union and the producing country, the “legislation applicable to forest management” is defined by the VPA agreement.</p>	Yes	<p>PEFC DK 001-4, Chapter 5 & Annex 1:</p> <p>Chapter 5: “(...) By signing the agreement, the forest owner undertakes to accept and comply with the following obligations: (...) 2) Relevant legislation and provisions regulating forest management in Denmark. A minimum list of relevant legislation can be found in <i>Annex 1 – Relevant Danish legislation, as well as ILO conventions</i>”</p> <p>Annex 1: “Relevant Danish legislation and ILO Conventions</p> <p>The links [for each referenced legislation] refer to the Retsinformation website (not translated into English): www.retsinformation.dk”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</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,	Yes	<p>PEFC DK 001-4, Chapter 5 & Annex 1:</p> <p>Chapter 5: “(...) By signing the agreement, the forest owner undertakes to accept and comply with the following obligations: (...) 2) Relevant legislation and provisions regulating forest management in Denmark. A minimum list of</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
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>relevant legislation can be found in <i>Annex 1 – Relevant Danish legislation, as well as ILO conventions</i></p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
6.3.1.3 The standard requires that where no anti-corruption legislation exists, the organisation must take alternative anti-corruption measures appropriate to the risk of corruption.	YES	<p>Assessment decision: Conformity</p> <p>Justification: The Danish Criminal Code governs bribery and corruption.</p> <p>Comment: The relevant elements of the Danish Criminal Code addressing corruption should be referenced in Annex 1 of DK 001-4.</p>
6.3.1.4 The standard requires that measures shall be implemented to address protection of the forest from unauthorised activities such as illegal logging, illegal land use, illegally initiated fires, and other illegal activities.	YES	<p>PEFC Denmark comment: “Not relevant- No or low risk of illegal activities.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The fact that the standard does not cover measures against unauthorised activities can be considered as acceptable, taking into account that Denmark has a very low crime rate. worldpopulationreview.com, “Some of the world's lowest crime rates are seen in Switzerland, Denmark, Norway, Japan, and New Zealand.”</p> <p>Comment: Relevant elements of Danish legislation addressing unauthorised activities concerning forests, in particular to illegal logging, illegal land use and illegally initiated fires, should be referenced in Annex 1 of DK 001-4.</p>
6.3.2 Legal, customary and traditional rights related to the forest land		
6.3.2.1 The standard requires that property rights, tree ownership and land tenure arrangements shall be clearly	Yes	PEFC DK 001-4, Chapter 5: “The forest owner must be able to document ownership of the areas included in the certification. If this is a matter of dispute,

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
<p>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.</p> <p>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.</p>		<p>ownership can be documented via <i>the Public Information Server</i>⁶ (OIS) or via a land certificate from the Land Registry.”</p> <p>Assessment decision: Conformity</p> <p>Justification: In the context of Denmark the benchmark can be considered as met.</p>
<p>6.3.2.2 The standard requires that forest practices and operations shall be conducted in recognition of the established framework of legal, customary and traditional rights such as outlined in ILO 169 and the UN Declaration on the Rights of Indigenous Peoples, which shall not be infringed upon without the free, prior and informed consent of the holders of the rights, including the provision of compensation where applicable. Where the extent of rights is not yet resolved, or is in dispute, there are processes for just and fair resolution. In such cases forest managers shall, in the interim, provide meaningful opportunities for parties to be engaged in forest management decisions whilst respecting the processes and roles and responsibilities laid out in the policies and laws where the certification takes place.</p>	Yes	<p>PEFC DK 001-4, 4.12, I.4.12.3: “Forest management is conducted in respect of ILO Conventions 29, 87, 98, 100, 105, 111, 138, 169, 182, 184 and the ILO Code of Good Practice: Safety and Health in Forestry Work, Annex 1 – Relevant Danish legislation and ILO Conventions.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>

⁶ <https://www.ois.dk/default.aspx>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
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	<p>PEFC DK 001-4, 4.12 & Annex 1:</p> <p>4.12: “Forest management must be conducted in compliance with the ILO Conventions on employee rights and the work environment, as well as human rights, <i>Annex 1 – Relevant Danish legislation and ILO Conventions</i>”</p> <p>Annex 1: “ (...) FN’s Verdenserklæring om Menneskerettigheder [Universal Declaration on Human Rights]”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
6.3.3 Fundamental ILO conventions		
<p>6.3.3.1 The standard requires that forest practices and operations shall comply with fundamental ILO conventions.</p> <p>Note: In countries where the fundamental ILO conventions have been ratified, the requirements of 6.3.3.1 apply. In countries where a fundamental convention has not been ratified and its content is not covered by applicable legislation, specific requirements shall be included in the forest management standard.</p>	Yes	<p>PEFC DK 001-4, 4.12 & Annex 1:</p> <p>4.12: “Forest management must be conducted in compliance with the ILO Conventions on employee rights and the work environment, as well as human rights, <i>Annex 1 – Relevant Danish legislation and ILO Conventions</i>”</p> <p>Annex 1: “Relevant Danish legislation and ILO Conventions</p> <p>ILO core conventions:</p> <ul style="list-style-type: none"> ▪ Forced Labour Convention (No. 29) ▪ Freedom of Association and Protection of the Right to Organise (No. 87) ▪ Right to Organise and Collective Bargaining (No. 98) ▪ Equal Remuneration Convention (No. 100) ▪ Forced Labour Convention (No. 105) ▪ Discrimination (Employment and Occupation) (No. 111) ▪ Minimum Age Convention (No. 138)

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<ul style="list-style-type: none"> Worst Forms of Child Labour (No. 182) Indigenous and Tribal Peoples (No. 169) Safety and Health in Agriculture (No. 184) (also covers forests)” <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
6.3.4 Health, safety and working conditions		
6.3.4.1 The standard requires that forest operations shall be planned, organised and performed in a manner that enables health and accident risks to be identified and all reasonable measures to be applied to protect workers from work-related risks. Workers shall be informed about the risks involved with their work and about preventive measures.	Yes	<p>PEFC DK 001-4, 4.6 & 4.12:</p> <p>“4.6 The forest owner must ensure that employees have the necessary instructions or qualifications to perform their duties in a safe and qualified manner and comply with the applicable forest management guidelines as well as legislation, including health and safety legislation. The forest owner can also use contracts to ensure that the contractor is able to document this. The forest owner must regularly ensure that employees receive the necessary further training in relation to the implementation of sustainable management.</p> <p>I.4.6.1 Documentation has been prepared concerning instruction or training of employees in relation to the implementation of sustainable forest management</p> <p>I.4.6.2 Documentation of completed further training of relevance to the Forest Management Standard”</p> <p>“4.12 (...)Forest management must be conducted in compliance with the ILO Conventions on employee rights and the work environment (...).</p> <p>I.4.12.3 Forest management is conducted in respect of (...) the ILO Code of Good Practice: Safety and Health in Forestry Work, Annex 1 – Relevant Danish</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>legislation and ILO Conventions.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
<p>6.3.4.2 The standard requires that working conditions shall be safe, and guidance and training in safe working practices shall be provided to all those assigned to a task in forest operations. Working hours and leave shall comply with national laws or applicable collective agreements.</p> <p>Note: Guidance for specifying national standards can be obtained from the ILO Code of Good Practice: Safety and Health in Forestry Work.</p>	Yes	<p>PEFC DK 001-4, 4.6, 4., 4.12 & chapter 6</p> <p>Chapter 6: “The standard also focuses on forestry employees and interaction with the surrounding community in general. Good working conditions must be ensured, and staff training and a knowledge of the Forest Management Standard are required.”</p> <p>“4.6 The forest owner must ensure that employees have the necessary instructions or qualifications to perform their duties in a safe and qualified manner and comply with the applicable forest management guidelines as well as legislation, including health and safety legislation. The forest owner can also use contracts to ensure that the contractor is able to document this. The forest owner must regularly ensure that employees receive the necessary further training in relation to the implementation of sustainable management.</p> <p>I.4.6.1 Documentation has been prepared concerning instruction or training of employees in relation to the implementation of sustainable forest management</p> <p>I.4.6.2 Documentation of completed further training of relevance to the Forest Management Standard”</p> <p>“4.12 The forest owner must ensure that pay and employment conditions for all employees, as well as contractors with conditions similar to employees for forest management, overall and as a minimum follow the expense level of pay and employment conditions laid down in the collective agreement entered into between the most representative social partner organisations in Denmark. The</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>forest owner must maintain an up-to-date list or database of contractors working in the forest, indicating the CBR number and briefly stating the nature of the tasks and the start date.</p> <p>Forest management must be conducted in compliance with the ILO Conventions on employee rights and the work environment, as well as human rights, <i>Annex 1 – Relevant Danish legislation and ILO Conventions</i>.</p> <p>I.4.12.1 Pay and employment conditions for all employees, as well as contractors with conditions similar to employees, are guaranteed</p> <p>I.4.12.2 There is an updated list or database of all contractors working in the forest”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
<p>6.3.4.3 The standard requires that wages of local and migrant forest workers as well as of contractors and other operators operating in PEFC-certified areas shall meet or exceed at least legal, industry minimum standards or, where applicable, collective bargaining agreements.</p> <p>Note: Where wages are below the living wage of a country, steps should be taken to attain increased wages towards a living wage level over time in addition to increases for inflation.</p>	Yes	<p>PEFC DK 001-4, 4.12: “The forest owner must ensure that pay and employment conditions for all employees, as well as contractors with conditions similar to employees for forest management, overall and as a minimum follow the expense level of pay and employment conditions laid down in the collective agreement entered into between the most representative social partner organisations in Denmark. The forest owner must maintain an up-to-date list or database of contractors working in the forest, indicating the CBR number and briefly stating the nature of the tasks and the start date.</p> <p>Forest management must be conducted in compliance with the ILO Conventions on employee rights and the work environment, as well as human rights, <i>Annex 1 – Relevant Danish legislation and ILO Conventions</i>.</p> <p>I.4.12.1 Pay and employment conditions for all employees, as well as contractors</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>with conditions similar to employees, are guaranteed</p> <p>I.4.12.2 There is an updated list or database of all contractors working in the forest”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
<p>6.3.4.4 The standard requires that the organisation is committed to equal opportunities, non-discrimination and freedom from workplace harassment. Gender equality shall be promoted.</p>	YES	<p>Regulated by danish law; Annex 1 – Relevant Danish legislation and ILO Conventions</p> <p>PEFC Denmark comment: “Danish organisations are committed to prompt gender equality by the Danish law. ”Promulgation of the Act on Equality between Women and Men.” See quotation below:</p> <p>”§ 1. The purpose of the Act is to promote equality between women and men, including equal integration, equal influence and equal opportunities in all functions of society based on the equal value of women and men. The purpose of the law is also to counteract direct and indirect discrimination on the grounds of gender and to counteract harassment and sexual harassment.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement can be considered as met.</p>
7. Support		
7.1 Resources		
7.1.1 The standard requires that the organisation shall determine and provide the resources needed for the	YES	PEFC DK 001-4, chapter 5: “Certification of forest management is confirmed by an agreement between the forest owner and the certification body/group

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
establishment, implementation, maintenance and continual improvement of the sustainable forest management system.		<p>leader, and shall be valid for a minimum of one year.</p> <p>By signing the agreement, the forest owner undertakes to accept and comply with the following obligations:</p> <p>1) PEFC Denmark's Forest Management Standard (...)"</p> <p>Assessment decision: Conformity</p> <p>Justification: Based on the understanding that conformity and implementation of the standard implies the provision of resources to do so, the benchmark can be considered as met.</p>
7.2 Competence		
7.2.1 The standard requires that forest managers, contractors, employees and forest owners shall be provided with sufficient information and kept up-to-date through continuous training in relation to sustainable forest management, as a precondition for all management planning and practices described in this benchmark.	Yes	<p>PEFC DK 001-4, 4.6, 4.8, 4.9:</p> <p>"4.6 The forest owner must ensure that employees have the necessary instructions or qualifications to perform their duties in a safe and qualified manner and comply with the applicable forest management guidelines as well as legislation, including health and safety legislation. The forest owner can also use contracts to ensure that the contractor is able to document this. The forest owner must regularly ensure that employees receive the necessary further training in relation to the implementation of sustainable management."</p> <p>"4.8 The forest owner must ensure in connection with management that tasks performed by employees and specialist machine operators are carried out in accordance with the requirements for sustainable forest management. This is ensured through employees' and specialist machine operators' awareness of and compliance with the parts of the policy and objectives that are relevant for the task in hand. Employees and specialist machine operators must also have</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>access to written documentation relevant to their tasks, including registered natural, cultural and recreational values. Moreover, they must always possess the knowledge relevant for the task. The owner must also ensure that specialist machine operators are at least in possession of skills as listed in <i>Annex 2 – Skills for machine operators.</i></p> <p>“4.9 Other contractors and users of the forest, e.g. hunters, firewood collectors, organisers of recreational activities, etc. must be given specific information on protections and designations if it is thought that the activity could affect them. For example, a firewood collector chopping wood in a middle-aged stand must be able to demonstrate knowledge relevant to the stand in question, such as protection of historic relics and natural values.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
7.3 Communication		
7.3.1 The standard requires that effective communication and consultation with local communities, indigenous peoples and other stakeholders relating to sustainable forest management shall be provided.	YES	<p>PEFC DK 001-4, 4.3: “The forest enterprise – owner and employees – shall communicate efficient with users and the local community with a view to ensuring reasonable:</p> <ul style="list-style-type: none"> - Planning and deployment of recreational activities in the forest - Utilisation of knowledge of the natural and cultural history of the forest - Other use of the forest <p>I.4.3.1 Records of events, excursions and meetings held and written requests from users and other external parties have been prepared”</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Assessment decision: Conformity Justification: The benchmark requirement is met.
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	PEFC DK 001-4, 4.11: "The forest owner must have a procedure for dealing with complaints about forest management conditions from local stakeholders in respect of this standard so that the owner and stakeholder can attempt to resolve the issues. If the problem cannot be resolved locally, the complaint must be forwarded to the certification body for individually certified properties or to the group leader for properties that are certified under a group, and they must to deal with the complaints at the next audit." Assessment decision: Conformity Justification: The benchmark requirement is met.
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	PEFC DK 001-4, 5.2: "As an introduction to certification, a number of records must be prepared and updated regularly. The written documentation for the forest property must be available to the certification body responsible for conducting the audit. This documentation may be in the form of an IT-based planning system, an existing management plan, a green management plan or similar" Assessment decision: Conformity Justification: The benchmark requirement is met.

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
7.5.2 The standard requires that the documented information is relevant, and updated as appropriate, to the activities of the organisation.	YES	<p>PEFC DK 001-4, 5.2: "As an introduction to certification, a number of records must be prepared and updated regularly."</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
8. Operation		
8.1 Criterion 1: Maintenance or appropriate enhancement of forest resources and their contribution to the global carbon cycle		
8.1.1 The standard requires that management shall aim to maintain or increase forests and their ecosystem services and maintain or enhance the economic, ecological, cultural and social values of forest resources.	YES	<p>PEFC DK 001-4, 5, 1.1, 1.2, 2.1, 3.2, 4.1</p> <p>"5 Planning - Properties must formulate and maintain a forest planning system appropriate to the size and use of the forest so as to assess the social, environmental and economic impact on [of?] forest management. The planning system must include a cycle of calculations and planning, implementation, monitoring and evaluation as described below."</p> <p>"1.1 Forest management must be structured so as to protect and improve forest resources. This includes the ability of the forest to produce a broad variety of forest products in the long term, adapt to and counteract climate change and protect and promote biodiversity as well as other valuable functions, taking into account the described objectives of the administration, opportunities and functions of the property."</p> <p>"1.2 The long-term, stable climate of the forest must be maintained and improved regularly."</p> <p>"2.1 (...)Taking into account the age-class distribution of the property, the occurrence of specific events such as windfalls during the previous planning period, and biodiversity measures implemented that may affect stores or</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>growth, it is necessary to ensure as far as possible that the forest's carbon stores in live and dead trees are maintained or increased while also maintaining or increasing the growth of wood and its quality as raw wood."</p> <p>"3.2 Coppiced forests and other land with old management systems of significant cultural historical, biological or landscape value must be preserved so as to maintain or promote those values."</p> <p>"3.4 The natural value of registered key habitats (see 5.2) must be maintained, and developed if possible."</p> <p>"4.1 (...) Areas of particular recreational value must also be designated. Recreational activities are taken into account when converting forest infrastructure. User groups that are in reasonable need of outdoor arrangements must be accommodated"</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
8.1.2 The standard requires that the quantity and quality of the forest resources and the capacity of the forest to store and sequester carbon shall be safeguarded in the medium and long term by balancing harvesting and growth rates, using appropriate silvicultural measures and preferring techniques that minimise adverse impacts on forest resources.	YES	<p>PEFC DK 001-4, 2.1: "The management of the forest must ensure and enhance the positive climate impact of the forest's stores and growth, as well as the climate-efficient use of the wood. The management of the forest must also ensure the robustness and adaptability of the forest to climate change, including future extremes of weather, diseases and insect infestations. The robustness and adaptability must be regularly developed and improved by means of balanced management choices, including the distribution and use of many tree species appropriate for the climate and location. This must be done in conjunction with the other requirements defined in the standard, as well as the specific goals, opportunities and limitations applicable to any given forest</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>property.</p> <p>The climate impact of the forest, including its robustness and adaptability in respect of damage, loss and emissions, is an interaction between:</p> <ul style="list-style-type: none"> ▪ The species composition and structure of the forest in relation to soil, climate and landscape, among others (see 1.1, 1.2 and 3.16) ▪ The carbon stores in live and dead trees and in soil (see 1.3, 3.3 and 3.9) ▪ Tree growth (see 1.2) ▪ The quality of wood as a raw material for wood products and hence its applications (see 1.1 and 1.2). <p>Taking into account the age-class distribution of the property, the occurrence of specific events such as windfalls during the previous planning period, and biodiversity measures implemented that may affect stores or growth, it is necessary to ensure as far as possible that the forest's carbon stores in live and dead trees are maintained or increased while also maintaining or increasing the growth of wood and its quality as raw wood."</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
8.1.3 The standard requires that climate positive practices in management operations, such as greenhouse gas emission reductions and efficient use of resources shall be encouraged.	YES	<p>PEFC DK 001-4, 2.2: "PEFC Denmark's Forest Management Standard – PEFC DK 001-3 [4?] requires the use of methods and techniques to be encouraged in forest management that ensure energy-efficient forest management with a view to reducing emissions of greenhouse gases from actual management operations. Management methods that are highly energy-intensive and/or pollute the air, such as crushing of logging waste and stumps and burning of logging waste in</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>the forest, may only be deployed in valid situations.</p> <p>I.2.2.1 Crushing of logging waste and stumps and burning of logging waste are deployed only in valid situations”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
8.1.4 The standard requires that forest conversion shall not occur unless in justified circumstances where the conversion:		
a) is in compliance with national and regional policy and legislation applicable for land use and forest management and is a result of national or regional land-use planning governed by a governmental or other official authority including consultation with affected stakeholders; and	YES	<p>PEFC DK 001-5: “The forest owner’s responsibilities on certification:</p> <p>Certification of forest management is confirmed by an agreement between the forest owner and the certification body/group entity, and shall be valid for a minimum of one year.</p> <p>By signing the agreement, the forest owner undertakes to accept and comply with the following obligations:</p> <ol style="list-style-type: none"> 1) PEFC Denmark’s Forest Management Standard 2) Relevant legislation and provisions regulating forest management in Denmark. A minimum list of relevant legislation can be found in Annex 1 – Relevant Danish legislation, as well as ILO conventions 3) Control through third-party auditing by a certification body <p>PEFC Denmark comment: “The Danish legislation is from Promulgation of the law on forests:</p> <p>”Chapter 3 Use of peace forest areas</p> <p>§ 8. The following applies to the individual area subject to the peace forest</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>obligation:</p> <p>1) The area must be kept overgrown with trees that form, or which within a reasonable period of time will form, closed forest of high-stemmed trees.</p> <p>2) Felling other than thinning must not take place until the vegetation or the individual tree has reached an age or dimension where it is ready for felling.”</p> <p>https://www.retsinformation.dk/eli/Ita/2019/315</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement can be considered as essentially addressed.</p>
b) entails a small proportion (no greater than 5 %) of forest type within the certified area; and	YES	<p>PEFC DK 001-4, 1.13: “Forest conversion shall not occur unless in justified circumstances where the conversion:</p> <p>a) entails a small proportion (no greater than 5%) of forest type within the certified area”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
c) does not have negative impacts on ecologically important forest areas, culturally and socially significant areas, or other protected areas; and	YES	<p>PEFC DK 001-4, 1.13: “Forest conversion shall not occur unless in justified circumstances where the conversion: (...) b) does not have negative impacts on ecologically important forest areas, culturally and socially significant areas, or other protected areas;”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
d) does not destroy areas of significantly high carbon stock; and	YES	<p>PEFC DK 001-4, 1.13: "Forest conversion shall not occur unless in justified circumstances where the conversion (...)</p> <p>c) does not destroy areas of significantly high carbon stock"</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
e) makes a contribution to long-term conservation, economic, and social benefits.	YES	<p>PEFC DK 001-4, 1.13: "Forest conversion shall not occur unless in justified circumstances where the conversion: (...)</p> <p>d) makes a contribution to long-term conservation, economic, and social benefits."</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
8.1.5 The standard requires that afforestation of ecologically important non-forest ecosystems shall not occur unless in justified circumstances where the conversion:		
a) is in compliance with national and regional policy and legislation applicable for land use and forest management and is a result of national or regional land-use planning governed by a governmental or other official authority; and	YES	<p>PEFC Denmark comment: "The Danish Forest Act and Nature Conservation Act states that ecologically important non-forest ecosystems shall not be changed and that afforestation of ecologically important non-forest ecosystems shall not occur. Lakes, streams, moors, bogs, salt marshes, beach marshes, fresh meadows, grasslands, etc. are in the category of important non-forest ecosystems in Denmark.</p> <p><i>"Nature Conservation Act Chapter 2 General protection provisions Protected habitats, etc.</i></p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p><i>Lakes, streams, moors, bogs, salt marshes, beach marshes, fresh meadows, grasslands, etc.</i></p> <p><i>§ 3. No change may be made in the condition of natural lakes whose area is more than 100 m², or of watercourses or parts of watercourses that have been designated as protected by the Minister of the Environment on the recommendation of the municipal council. However, this does not apply to usual maintenance work in watercourses.</i></p> <p><i>PCS. 2. No changes may be made to the condition of</i> <i>1) moor (or heaths),</i> <i>2) bogs and the like,</i> <i>3) beach meadows and beach swamps as well</i> <i>4) fresh meadows and biological pastures,</i> <i>when such habitat types individually, together or in connection with the lakes mentioned in para. 1, is larger than 2,500 m² in contiguous area.</i></p> <p><i>PCS. Also, no change shall be made in the condition of bogs and the like that are less than 2,500 m² when they are connected to a lake or a watercourse that is covered by the protection in subsection. 1."</i> https://www.retsinformation.dk/eli/Ita/2021/1986</p> <p>The Forestry act:</p> <p><i>"Chapter 4 § 28. Lakes, bogs, heaths (or moor), salt marshes or beach marshes, fresh meadows and biological pastures belonging to peace forests and which are not covered by section 3 of the Nature Conservation Act because they are smaller than the size limits set out therein, may not be cultivated, dewatered, planted or otherwise altered.</i></p> <p><i>PCS. 2. The prohibition in para. 1 also applies to watercourses which are not</i></p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p><i>covered by section 3 of the Nature Conservation Act because they have not been designated as protected by the Minister of the Environment and Food on the recommendation of the municipal council. However, the ban does not apply to usual maintenance work in watercourses.”</i></p> <p>https://www.retsinformation.dk/eli/ta/2019/315”</p> <p>Assessment decision: Conformity</p> <p>Justification: According to the information provided by PEFC Denmark, Danish legislation categorically prohibits the afforestation of ecologically important non-forest ecosystems without exemptions. Based on this information, the benchmark can be considered as met.</p>
b) is established based on a decision-making basis where affected stakeholders have opportunities to contribute to the decision-making on conversion through transparent and participatory consultation processes; and	YES	<p>See 8.1.5a</p> <p>Assessment decision: Conformity</p> <p>Justification: According to the information provided by PEFC Denmark, Danish legislation categorically prohibits the afforestation of ecologically important non-forest ecosystems without exemptions. Based on this information, the benchmark can be considered as met.</p>
c) does not have negative impacts on threatened (including vulnerable, rare or endangered) nonforest ecosystems, culturally and socially significant areas, important habitats of threatened species or other protected areas; and	YES	<p>See above and also PEFC DK 001, 1.3: “The planting of abandoned agricultural land and other open areas in or adjacent to the forest may be considered in cases <u>where this could add economic, social, cultural or natural value without significantly harming other values</u>. Lowland soils which would not naturally have a forest canopy are not planted initially unless the above values can particularly justify it. Tree species that do not require continued drainage should be selected when planting.</p> <p>I.1.3.1 The value of planting of abandoned agricultural land and other open areas in or adjacent to the forest is considered and lowland soils are</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>planted only following particularly careful consideration”</p> <p>Assessment decision: Conformity</p> <p>Justification: According to the information provided by PEFC Denmark, Danish legislation categorically prohibits the afforestation of ecologically important non-forest ecosystems without exemptions. Based on this information, the benchmark can be considered as met. In addition, due to the requirement that social, cultural or natural values shall not be significantly harmed by any afforestation the benchmark can also be considered as met.</p>
d) entails a small proportion of the ecologically important non-forest ecosystem managed by an organisation; and	YES	<p>See 8.1.5a</p> <p>Assessment decision: Conformity</p> <p>Justification: According to the information provided by PEFC Denmark, Danish legislation categorically prohibits the afforestation of ecologically important non-forest ecosystems without exemptions. Based on this information, the benchmark can be considered as met.</p>
e) does not destroy areas of significantly high carbon stock; and	YES	<p>See 8.1.5a</p> <p>Assessment decision: Conformity</p> <p>Justification: According to the information provided by PEFC Denmark, Danish legislation categorically prohibits the afforestation of ecologically important non-forest ecosystems without exemptions. Based on this information, the benchmark can be considered as met.</p>
f) makes a contribution to long-term conservation, economic, and social benefits.	YES	<p>See 8.1.5a and also PEFC DK 001, 1.3: “The planting of abandoned agricultural land and other open areas in or adjacent to the forest may be considered in cases where this could add economic, social, cultural or natural value without</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>significantly harming other values. (...)”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark can be considered as met.</p>
8.1.6 The standard requires that if conversion of severely degraded forests to forest plantations is being considered, it must add economic, ecological, social and/or cultural value. Precondition of adding such value are circumstances where the conversion:		
a) is in compliance with national and regional policy and legislation applicable for land use and forest management and is a result of national or regional land-use planning governed by a governmental or other official authority; and	NO	<p>Comment by PEFC Denmark: “Conversion of severely degraded forests to forest plantations is not possible by the Forestry Act:</p> <p>The Forestry Act - Chapter 4:</p> <p>“§ 26. Oak shrubs worthy of preservation shall be preserved as oak shrubs. The Minister for the Environment and Food must register oak scrub worthy of preservation and may, on this basis, enter into agreements with the owners to ensure their preservation.</p> <p>§ 27. External forest edges of deciduous trees and shrubs on peace forest areas must be preserved.</p> <p>§ 28. Lakes, bogs, heaths, salt marshes or beach marshes, fresh meadows and biological pastures belonging to the peace forest and which are not covered by the Nature Conservation Act § 3, because they are smaller than the size limits stipulated therein, may not be cultivated, dewatered, planted or otherwise altered.</p> <p>PCS. 2. The prohibition in para. 1 also applies to watercourses which are not covered by section 3 of the Nature Conservation Act because they have not been designated as protected by the Minister of the Environment and Food on the recommendation of the municipal council. However, the ban does not apply</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>to usual maintenance work in watercourses.”</p> <p>https://www.retsinformation.dk/eli/lt/2019/315”</p> <p>Assessment decision: Minor nonconformity</p> <p>Justification: Without the provision of additional information/explanation by PEFC Denmark it is not clear in the view of the assessor, how the referenced legislation addresses the conversion of “degraded forests”.</p> <p>Comment: The definition of the term “degraded forest” in the standard referring to relevant legislation may be worth considering.</p>
b) is established based on a decision-making basis where affected stakeholders have opportunities to contribute to the decision-making on conversion through transparent and participatory consultation processes; and	NO	<p>See 8.1.6a</p> <p>Assessment decision: Minor nonconformity</p> <p>Justification: Without the provision of additional information/explanation by PEFC Denmark it is not clear in the view of the assessor, how the referenced legislation addresses the conversion of “degraded forests”.</p>
c) has a positive impact on long-term carbon sequestration capacity of forest vegetation; and	NO	<p>See 8.1.6a</p> <p>Assessment decision: Minor nonconformity</p> <p>Justification: Without the provision of additional information/explanation by PEFC Denmark it is not clear in the view of the assessor, how the referenced legislation addresses the conversion of “degraded forests”.</p>
d) does not have negative impacts on ecologically important forest areas, culturally and socially significant areas, or other	NO	See 8.1.6a

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
protected areas; and		Assessment decision: Minor nonconformity Justification: Without the provision of additional information/explanation by PEFC Denmark it is not clear in the view of the assessor, how the referenced legislation addresses the conversion of “degraded forests”.
e) safeguards protective functions of forests for society and other regulating or supporting ecosystem services; and	NO	See 8.1.6a Assessment decision: Minor nonconformity Justification: Without the provision of additional information/explanation by PEFC Denmark it is not clear in the view of the assessor, how the referenced legislation addresses the conversion of “degraded forests”.
f) safeguards socio-economic functions of forests, including the recreational function and aesthetic values of forests and other cultural services; and	NO	See 8.1.6a Assessment decision: Minor nonconformity Justification: Without the provision of additional information/explanation by PEFC Denmark it is not clear in the view of the assessor, how the referenced legislation addresses the conversion of “degraded forests”.
g) has a land history providing evidence that the degradation is not the consequence of deliberate poor forest management practices; and	NO	See 8.1.6a Assessment decision: Minor nonconformity Justification: Without the provision of additional information/explanation by PEFC Denmark it is not clear in the view of the assessor, how the referenced legislation addresses the conversion of “degraded forests”.
h) is based on credible evidence demonstrating that the area	NO	See 8.1.6a

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
is neither recovered nor in the process of recovery.		Assessment decision: Minor nonconformity Justification: Without the provision of additional information/explanation by PEFC Denmark it is not clear in the view of the assessor, how the referenced legislation addresses the conversion of “degraded forests”.
8.2 Criterion 2: Maintenance of forest ecosystem health and vitality		
8.2.1 The standard requires that health and vitality of forest ecosystems shall be maintained or enhanced and degraded forest ecosystems shall be rehabilitated wherever and as far as economically feasible, by making best use of natural structures and processes and using preventive biological measures.	YES	<p>PEFC DK 001-4, 3.14, 3.15, 1.8</p> <p>“3.15 The health and vitality of the forest must be monitored regularly in relation to external factors such as diseases, pests, overgrazing, fire or damage caused by climatic factors that may affect the health and vitality of the forest. The impact of such factors on forest management must be assessed when determining damage caused by such factors. Data from the National Forest Inventory (NFI) on the current state of forests and potential threats to forests, along with other information from the Information Service at the Department of Geosciences and Natural Resource Management, can be used as a basis for the evaluation.”</p> <p>“3.14 Invasive species must be controlled (see 1.8) in areas where they threaten biodiversity (e.g. species, habitats) or other forest functions (e.g. forest regeneration, groundwater, recreational activities), and where economically and practically feasible. There is a particular obligation to control invasive species in biodiversity areas, including undisturbed forests. (...)”</p> <p>“1.8 The use of pesticides must be minimised in areas not managed intensively. Silvicultural alternatives and biological agents are preferred to the use of chemical pesticides. (...)”</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Assessment decision: Conformity Justification: The benchmark requirement is met.
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 DK 001-4, 1.2, 3.1, 3.14</p> <p>“3.1 A structure must be developed in the forest so that it consists of different tree species of different ages, and to create variation in habitats and a stable, robust forest. In the case of thinning and selective cutting, tree and bush species other than the main tree species must be promoted where this is economically justifiable and where these can usefully form part of the stand structure”</p> <p>“1.2 The long-term, stable climate of the forest must be maintained and improved regularly. Silviculture must therefore fundamentally ensure that greater freedom is created in the choice of future regeneration methods and tree species.”</p> <p>“3.14 Invasive species⁷ must be controlled (see 1.8) in areas where they threaten biodiversity (e.g. species, habitats) or other forest functions (e.g. forest regeneration, groundwater, recreational activities), and where economically and practically feasible. There is a particular obligation to control invasive species in biodiversity areas, including undisturbed forests. The forest owner must be familiar with the relevant invasive species. Species included in the list of the most harmful invasive species² must not be introduced onto the forest property.”</p>

⁷ Danish Environmental Protection Agency, 2017. Action plan against invasive species, *Annex 3 – Environmental requirements for forest machinery and hand tools*

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Assessment decision: Conformity Justification: The benchmark requirement is met.
8.2.3 The standard requires that use of fire shall be limited to regions where fire is an essential tool in forest management for regeneration, wildfire protection and habitat management or a recognized practice of indigenous peoples. In these cases adequate management and control measures shall be taken.	YES	PEFC DK 001-4, 3.16: "Forest fires must be avoided, but burning may be used in instances where it forms part of nature conservation with a view to attaining defined objectives. Fire protection plans are recommended, and firebreaks should be established at vulnerable sites." Assessment decision: Conformity Justification: The benchmark requirement is met.
8.2.4 The standard requires that appropriate forest management practices such as reforestation and afforestation with tree species and provenances that are suited to the site conditions or the use of tending, harvesting and transport techniques that minimise tree and/or soil damages shall be applied.	YES	PEFC DK 001-4, 1.10, 1.11, 3.11: "1.10 The use of native species must be encouraged so that the property's forested area consists of a minimum of 20% of native tree species on poor soils and 55% of native tree species on good soils. The percentages are calculated on the basis of the recorded percentages of associated tree species. The minimum limits do not apply to forest properties of less than 50 hectares. However, in connection with regeneration and other management measures, these properties must exploit natural opportunities to promote the presence of native species by prioritising native species by means of selective cutting and leaving damp holes for natural overgrowth of birch and willow, for example. 1.11 Non-native tree species may only be used in areas where they do not threaten significant natural values and are adapted to local conditions. The following areas must not be converted to non-native species: a) Stands of an age significantly exceeding the normal rotation age of the species, and/or

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>b) Stands of a biologically rich nature that are linked with continuity of the forest canopy cover and/or stable hydrology</p> <p>c) Areas of native tree species which may act as buffer zones or create links between stands as referred to in the previous two paragraphs</p> <p>d) If areas of native species are converted to areas of non-native species, a survey of areas of native species which must not be converted into non-native species must be conducted beforehand”</p> <p>“3.11 Felling, transport and regeneration techniques that protect the site and stand must be used in order to ensure favourable soil conditions and prevent damage to rare, delicate and special ecosystems and genetic reserves. Transport in the forest is carried out in a way that minimises damage. In particular, significant driving damage must be avoided through the use of machinery adapted to the locality and/or permanent tracks and the timing of operations.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
8.2.5 The standard requires that the indiscriminate disposal of waste on forest land shall be strictly avoided. Non-organic waste and litter shall be collected, stored in designated areas and removed in an environmentally-responsible manner. The spillage of oil or fuel during forest management operations shall be prevented. Emergency procedures for the minimisation of risk of environmental harm arising from the accidental spillage shall be in place.	YES	<p>PEFC DK 001-4, 3.13: “Spillage of oil and other substances harmful to the environment during forest management activities (see <i>Annex 3 – Environmental requirements for forest machinery and hand tools</i>) and disposal of waste on forest land must always be avoided.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
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	<p>PEFC DK 001-4, 1.8, 1.6</p> <p>“T1.8 The use of pesticides must be minimised in areas not managed intensively. Silvicultural alternatives and biological agents are preferred to the use of chemical pesticides. (...)”</p> <p>“1.6 Intensively managed areas are developed in a natural and environmentally friendly manner so that:</p> <p>a) The use of pesticides and fertilisers is minimal and environmentally responsible (...)”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
8.2.7 The standard requires that any use of pesticides is documented.	YES	<p>PEFC DK 001-4, 5.3</p> <p>“5.3 The forest owner must regularly supervise forest management, which includes preparing documented management records that clearly refer to the division of the forest map (...) b) Annual consumption of pesticides at property level, with a record of the treated locations”</p> <p>“1.6 (...) I.1.6.2 Evaluation of whether the use of pesticides in intensively managed areas has been minimised is based on pesticide application logs”</p> <p>“1.8 (...) I 1.8.1 Pesticide use on the property is assessed on the basis of the pesticide application log and compared with planting records and reasons given for use”</p> <p>Assessment decision: Conformity</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Justification: The benchmark requirement is met.
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.	NO	<p>PEFC Denmark comment: "In denmark the regulation for allowed pesticides is regulated by a "positive list" where any pesticied not mentiond by this list is banned.</p> <p>https://mst.dk/service/publikationer/publikationsarkiv/2010/jul/listen-over-uoenskede-stoffer-2009/</p> <p>https://middeldatabasen.dk/currentBannedProducts.asp</p> <p>https://middeldatabasen.dk/positiveList.asp</p> <p>In Denmark there is requirements for training and authorization regarding pesticides approved for professional use as they may only be purchased and used by professional users who have completed the necessary training and who have the necessary authorization in the Danish Environmental Protection Agency's authorization system for the use of pesticides - MAB. This applies whether you are spraying on a golf course, on the municipal sidewalks, in a field, in a greenhouse, in the woods or anywhere else. (https://mst.dk/kemi/pesticider/anvendelse-af-pesticider/brugere-professionel-brug/uddannelse-og-autorisation/krav-om-uddannelse-og-autorisation/)"</p> <p>Assessment decision: Minor nonconformity</p> <p>Justification: From the information provided by PEFC Denmark, it is not clear to the assessor, if any WHO Class 1A and 1B pesticides and other highly toxic pesticides are currently on the referenced "positive list" or not or might be so in future. If PEFC Denmark cannot provide evidence on this, then this prohibition required by the benchmark would need to be assured though PEFC Denmark's own system.</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
<p>8.2.9 The standard requires that pesticides, such as chlorinated hydrocarbons whose derivatives remain biologically active and accumulate in the food chain beyond their intended use, and any pesticides banned by international agreement, shall be prohibited.</p> <p>Note: "Pesticides banned by international agreements" are defined in the Stockholm Convention on Persistent Organic Pollutants.</p>	NO	<p>See 8.2.8</p> <p>Assessment decision: Minor nonconformity</p> <p>Justification: From the information provided by PEFC Denmark, it is not clear to the assessor, if any pesticides such as chlorinated hydrocarbons whose derivatives remain biologically active and accumulate in the food chain beyond their intended use, and any pesticides banned by international agreement are currently on the referenced "positive list" or not or might be so in future. If PEFC Denmark cannot provide evidence on this, then this prohibition required by the benchmark would need to be assured through PEFC Denmark's own system.</p>
<p>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.</p>	YES	<p>PEFC DK 001-4, 4.7: "The use of pesticides must be compliant with the instructions provided by the manufacturer, and must be carried out with the correct equipment and training."</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
<p>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.</p>	YES	<p>PEFC DK 001-4, 1.7, 1.6</p> <p>"1.7 In areas that are not managed intensively, the use of fertilisers must be phased out through adaptation of land use systems so that:</p> <ul style="list-style-type: none"> a) There is no use of fertilisers outside intensively managed areas where there are special natural considerations linked with the oligotrophic state of the area b) Fertilisers may only be used in connection with forest planting on oligotrophic sites where coniferous areas are to be converted into broadleaf areas and where this is critical for establishment of a usable young

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>plantation</p> <p>c) The contribution of nutrients from the surrounding atmosphere must be taken into account (included) here</p> <p>d) The land use systems are adapted in such a way that no fertilisers have to be used (or ash has to be recycled). Exemptions from this must be covered by a statement from an expert with a knowledge of biological systems”</p> <p>“1.6 Intensively managed areas are developed in a natural and environmentally friendly manner so that:</p> <p>a) The use of pesticides and fertilisers is minimal and environmentally responsible”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
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	<p>PEFC DK 001-4, 1.1, 1.4</p> <p>“1.1 Forest management must be structured so as to protect and improve forest resources. This includes the ability of the forest to produce a broad variety of forest products in the long term (...).”</p> <p>“1.4 Forest resources – both wood and non-wood products – must be utilised in a way that does not affect the long-term soil capability. For the production of wood, this is ensured through compliance with the other requirements stipulated in this standard. If non-wood products are to be utilised commercially, the owner must establish management guidelines so as to ensure that this does</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>not affect the long-term soil capability.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
8.3.2 The standard requires that sound economic performance shall be pursued, taking into account possibilities for new markets and economic activities in connection with all relevant goods and services of forests.	YES	<p>PEFC DK 001-4, chapter 6</p> <p>Forest management must form a cycle of registrations and planning, implementation, monitoring and evaluation which makes it possible to assess the social, environmental and economic impact on [of?] forest management. Therefore, the standard includes a number of requirements for registration and documentation which must form a basis for this evaluation. It is also the basis for a correct and simple audit of forest management and ensures high levels of credibility and quality for any PEFC certification.</p> <p>Assessment decision: Conformity</p> <p>Justification: The requirement of the standard is sufficient to meet the benchmark.</p>
8.3.3 The standard requires that management, harvesting and regeneration operations shall be carried out at a time, and in a way, that does not reduce the productive capacity of the site, for example by avoiding damage to soil and retained stands and trees.	YES	<p>PEFC DK 001-4, 3.11: “3.11 Felling, transport and regeneration techniques that protect the site and stand must be used in order to ensure favourable soil conditions and prevent damage to rare, delicate and special ecosystems and genetic reserves. Transport in the forest is carried out in a way that minimises damage. In particular, significant driving damage must be avoided through the use of machinery adapted to the locality and/or permanent tracks and the timing of operations.”</p> <p>Assessment decision: Conformity</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Justification: The benchmark requirement is met.
8.3.4 The standard requires that harvesting levels of both wood and non-wood forest products shall not exceed a rate that can be sustained in the long term, and optimum use shall be made of the harvested products.	YES	<p>PEFC DK 001-4, 1.4, 2.1</p> <p>“1.4 Forest resources – both wood and non-wood products – must be utilised in a way that does not affect the long-term soil capability. For the production of wood, this is ensured through compliance with the other requirements stipulated in this standard. If non-wood products are to be utilised commercially, the owner must establish management guidelines so as to ensure that this does not affect the long-term soil capability.”</p> <p>2.1: “The management of the forest must ensure and enhance the positive climate impact of the forest’s stores and growth, as well as the climate-efficient use of the wood.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
8.3.5 The standard requires that adequate infrastructure such as roads, skid tracks or bridges shall be planned, established and maintained to ensure efficient delivery of goods and services while minimising negative impacts on the environment.	YES	<p>PEFC DK 001-4, 3.12, 3.11</p> <p>“3.12 When constructing forest roads, crossings and other forest infrastructures, it is necessary to ensure that the aquatic environment is not adversely affected and that the natural level and functions of watercourses are preserved. It is also necessary to ensure that areas that are as small as possible are exposed. Appropriate drainage of newly built roads must be ensured and maintained.”</p> <p>“3.11 Felling, transport and regeneration techniques that protect the site and stand must be used in order to ensure favourable soil conditions and prevent damage to rare, delicate and special ecosystems and genetic reserves. Transport in the forest is carried out in a way that minimises damage. In particular,</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>significant driving damage must be avoided through the use of machinery adapted to the locality and/or permanent tracks and the timing of operations.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
8.4 Criterion 4: Maintenance, conservation and appropriate enhancement of biological diversity in forest ecosystems		
8.4.1 The standard requires that management planning shall aim to maintain, conserve or enhance biodiversity on landscape, ecosystem, species and genetic levels.	YES	<p>PEFC DK 001-4, Chapter 6</p> <p>The objective of the Danish PEFC Forest Management Standard is to promote sustainable development and management of Danish forests through the certification of forests, taking into account economic, ecological and social aspects in forest management</p> <p>Assessment decision: onformity</p> <p>Justification: The benchmark requirement is</p>
<p>8.4.2 The standard requires that inventory, mapping and planning of forest resources shall identify, protect, conserve or set aside ecologically important forest areas.</p> <p>Note: This does not prohibit forest management activities that do not damage the important ecologic values of those biotopes.</p>	YES	<p>PEFC DK 001-4, 3.2, 5.2</p> <p>3.2</p> <p>Coppiced forests and other land with old management systems of significant cultural historical, biological or landscape value must be preserved so as to maintain or promote those values. Old management systems include: Coppicing, forest pasture, cut or grazed forest meadows, oak-bark forest and selective felling.</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>I.3.2.1 Evaluation of the condition and management of coppiced forests, as well as other areas using old management systems</p> <p>5.2</p> <p>g) These records relate to maps of forests that are naturally of particular value and areas with high natural preservation value:</p> <ul style="list-style-type: none"> ▪ Designated biodiversity areas, including undisturbed forest ▪ Registered conservation areas, as well as areas compliant with Article 3 of the Nature Conservation Act, and possibly mapped Natura 2000 habitats registered with the authorities. ▪ Other natural values (key habitats) ▪ Possibly areas with native species that must not be converted to non-native species (see criterion 1.11) <p>Assessment decision: onformity</p> <p>Justification: The benchmark requirement is</p>
<p>8.4.3 The standard requires that protected, threatened and endangered plant and animal species shall not be exploited for commercial purposes. Where necessary, measures shall be taken for their protection and, where relevant, to increase their population.</p> <p>Note: The requirement does not preclude trade according to</p>	YES	<p>PEFC DK 001-4, 3.7</p> <p>Typical old trees and trees of particular natural or cultural historical value must be preserved as habitat trees. These trees must be adequately protected and have access to light when planning and conserving stands.</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
CITES requirements.		<p>I.3.7.1 Typical old trees are preserved and guaranteed sufficient access to light</p> <p>3.8</p> <p>Rare native species, including the endangered species on the Red List, must be protected or promoted and must not be exploited commercially unless this obviously does not threaten local populations, such as during the hunting season for the species.</p> <p>Assessment decision: onformity</p> <p>Justification: The benchmark requirement is</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 DK 001-4, 1.2</p> <p>The long-term, stable climate of the forest must be maintained and improved regularly. Silviculture must therefore fundamentally ensure that greater freedom is created in the choice of future regeneration methods and tree species</p> <p>a) By maintaining sufficient tree volume over the property's forested area.</p> <p>b) By using regeneration methods that quickly and safely establish workable regeneration that does not prevent the use of natural regeneration or succession in suitable locations.</p> <p>c) By using regeneration methods that ensure permanent forest canopy cover where this is possible in terms of silviculture and is deemed to be</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		economically justifiable.
<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 DK 001-4, 1.10 and 1.11</p> <p>“1.10 The use of native species must be encouraged so that the property’s forested area consists of a minimum of 20% of native tree species on poor soils and 55% of native tree species on good soils. The percentages are calculated on the basis of the recorded percentages of associated tree species. The minimum limits do not apply to forest properties of less than 50 hectares. However, in connection with regeneration and other management measures, these properties must exploit natural opportunities to promote the presence of native species by prioritising native species by means of selective cutting and leaving damp holes for natural overgrowth of birch and willow, for example.”</p> <p>“1.11 Non-native tree species may only be used in areas where they do not threaten significant natural values and are adapted to local conditions. The following areas must not be converted to non-native species:</p> <ul style="list-style-type: none"> a) Stands of an age significantly exceeding the normal rotation age of the species, and/or b) Stands of a biologically rich nature that are linked with continuity of the forest canopy cover and/or stable hydrology c) Areas of native tree species which may act as buffer zones or create links between stands as referred to in the previous two paragraphs d) If areas of native species are converted to areas of non-native species, a survey of areas of native species which must not be converted into non-native species must be conducted beforehand”

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Assessment decision: Conformity Justification: The benchmark requirement is met.
8.4.6 The standard requires that afforestation, reforestation and other tree planting activities that contribute to the improvement and restoration of ecological connectivity shall be promoted.	YES	<p>PEFC DK 001-4, 1.2 and 1.3.</p> <p>“1.2 The long-term, stable climate of the forest must be maintained and improved regularly. Silviculture must therefore fundamentally ensure that greater freedom is created in the choice of future regeneration methods and tree species.</p> <p>This must be achieved as follows:</p> <ul style="list-style-type: none"> a) By maintaining sufficient tree volume over the property’s forested area. b) By using regeneration methods that quickly and safely establish workable regeneration that does not prevent the use of natural regeneration or succession in suitable locations. c) By using regeneration methods that ensure permanent forest canopy cover where this is possible in terms of silviculture and is deemed to be economically justifiable. d) Clear cutting may be used where regeneration methods that ensure permanent forest canopy cover cannot be used in a justifiable manner. e) Clear cutting operations are designed and remain within a specific area so as to ensure that the subsequent culture is established rapidly and that the forest climate and the stability of surrounding stands are not compromised. f) Clear cutting operations must not be used in areas where there is a

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>biologically rich environment linked to continuity of forest canopy cover and/or stable hydrology, and in particular it must be possible to justify the extent and use of clear cutting operations.</p> <p>g) The structure, size and tree species composition of the regenerated area for clear cutting operations are adapted to match the extent and stand structure of the forest so as to create an opportunity for a sustainable forest climate and a good felling cycle in the future. Natural and cultural values must also be taken into account when planting.</p> <p>h) Attempts must be made as far as possible to restore depleted parts of the forest by silvicultural means.</p> <p>i) When planting or seeding, regeneration must be established within three growing seasons in the event of clear cutting operations. or five growing seasons if cultural dormancy is used to counter weevil infestations on conifers.</p> <p>This does not prevent the establishment and management of open nature areas, areas with coppiced forests, forest pasture and areas with intensive management systems, as well as other special management within the provisions and potential exemptions provided for in the Forestry Act. However, forests that are naturally of particular value (see 1.11) cannot be cleared in order to increase the intensively managed area.</p> <p>“1.3 The planting of abandoned agricultural land and other open areas in or adjacent to the forest may be considered in cases where this could add economic, social, cultural or natural value without significantly harming other values. Lowland soils which would not naturally have a forest canopy are not planted initially unless the above values can particularly justify it. Tree species</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>that do not require continued drainage should be selected when planting.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</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 DK 001-4, 1.12: “Use of genetically modified plant material is prohibited. Similarly, clones are not allowed as a main tree species over more than 5% of the forested area.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</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 DK 001-4, 3.1: “A structure must be developed in the forest so that it consists of different tree species of different ages, and to create variation in habitats and a stable, robust forest. In the case of thinning and selective cutting, tree and bush species other than the main tree species must be promoted where this is economically justifiable and where these can usefully form part of the stand structure.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
<p>8.4.9 The standard requires that traditional management practices that create valuable ecosystems on appropriate</p>	YES	<p>PEFC DK 001-4, 3.2: “Coppiced forests and other land with old management systems of significant cultural historical, biological or landscape value must be</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
sites shall be supported, where appropriate.		<p>preserved so as to maintain or promote those values. Old management systems include: Coppicing, forest pasture, cut or grazed forest meadows, oak-bark forest and selective felling.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
8.4.10 The standard requires that tending and harvesting operations shall be conducted in a way that does not cause lasting damage to ecosystems. Wherever possible, practical measures shall be taken to maintain or improve biological diversity.	YES	<p>PEFC DK 001-4, 3.11, 3.1</p> <p>“3.11 Felling, transport and regeneration techniques that protect the site and stand must be used in order to ensure favourable soil conditions and prevent damage to rare, delicate and special ecosystems and genetic reserves. Transport in the forest is carried out in a way that minimises damage. In particular, significant driving damage must be avoided through the use of machinery adapted to the locality and/or permanent tracks and the timing of operations.”</p> <p>“3.1 A structure must be developed in the forest so that it consists of different tree species of different ages, and to create variation in habitats and a stable, robust forest. In the case of thinning and selective cutting, tree and bush species other than the main tree species must be promoted where this is economically justifiable and where these can usefully form part of the stand structure.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
8.4.11 The standard requires that infrastructure shall be planned and constructed in a way that minimizes damage to ecosystems, especially to rare, sensitive or representative ecosystems and genetic reserves, and that takes threatened	YES	<p>PEFC DK 001-4, 3.12, 3.11, 3.9, 3.8, 3.18</p> <p>“3.12 When constructing forest roads, crossings and other forest infrastructures, it is necessary to ensure that the aquatic environment is not adversely affected and that the natural level and functions of watercourses are preserved. It is also</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
or other key species – in particular their migration patterns – into consideration.		<p>necessary to ensure that areas that are as small as possible are exposed. Appropriate drainage of newly built roads must be ensured and maintained.”</p> <p>“3.11 Felling, transport and regeneration techniques that protect the site and stand must be used in order to ensure favourable soil conditions and prevent damage to rare, delicate and special ecosystems and genetic reserves. Transport in the forest is carried out in a way that minimises damage. In particular, significant driving damage must be avoided through the use of machinery adapted to the locality and/or permanent tracks and the timing of operations.”</p> <p>“3.9 Activities impacting negatively must be regulated so as to protect areas of high natural preservation value and forests that are naturally of particular value.”</p> <p>“3.8 Rare native species, including the endangered species on the Red List , must be protected or promoted and must not be exploited commercially unless this obviously does not threaten local populations, such as during the hunting season for the species. For selected bird species listed in Annex 5 – Selected bird species, there must be no felling activities within a radius of 100 metres from the nesting tree during the rearing season.”</p> <p>“3.18 Fencing in the forest must be used in a manner that does not block or hinder the migration of fauna. Fences must be maintained and taken down after use.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
8.4.12 The standard requires that, with due regard to management objectives, measures shall be taken to control	Yes	PEFC DK 001-4, 3.17: “Wildlife management must be implemented so that the management objectives and versatility of the management of the forest

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
the pressure of animal populations on forest regeneration and growth as well as on biodiversity.		<p>property can be achieved in the short and long term. Attention must be paid to ensuring that biting, raking and bark stripping by wildlife do not threaten the practical implementation of the selection of tree species adapted to local conditions, but ensure that a number of tree species can be regenerated regularly (by means of planting and natural regeneration, for example) and cultivated economically on the property. Particular attention must be paid to ensuring that there is no restriction to one or very few significant tree species over time due to the impact of wildlife on the forest. Putting up of smaller control fences (10x10 metres, for example) is encouraged so as to support the evaluation of the impact of wildlife on forest regeneration, flora and fauna.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
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 DK 001-4, 3.3, 4.5, 3.8, 3.7</p> <p>“3.3 Silviculture must assist with continuous creation of large, old trees and dead wood in the forest in order to ensure biodiversity”</p> <p>“4.5 Landscape features of the forest such as distinctive trees and scenic views must be regularly maintained and improved.”</p> <p>“3.8 Rare native species, including the endangered species on the Red List , must be protected or promoted and must not be exploited commercially unless this obviously does not threaten local populations, such as during the hunting season for the species.”</p> <p>“3.7 Typical old trees and trees of particular natural or cultural historical value must be preserved as habitat trees. These trees must be adequately protected and have access to light when planning and conserving stands.”</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
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 DK 001-4, 2.1: “The management of the forest must ensure and enhance the positive climate impact of the forest’s stores and growth, as well as the climate-efficient use of the wood. The management of the forest must also ensure the robustness and adaptability of the forest to climate change, including future extremes of weather, diseases and insect infestations. The robustness and adaptability must be regularly developed and improved by means of balanced management choices, including the distribution and use of many tree species appropriate for the climate and location. This must be done in conjunction with the other requirements defined in the standard, as well as the specific goals, opportunities and limitations applicable to any given forest property.</p> <p>The climate impact of the forest, including its robustness and adaptability in respect of damage, loss and emissions, is an interaction between:</p> <ul style="list-style-type: none"> - The species composition and structure of the forest in relation to soil, climate and landscape, among others (see 1.1, 1.2 and 3.16) - The carbon stores in live and dead trees and in soil (see 1.3, 3.3 and 3.9) - Tree growth (see 1.2) - The quality of wood as a raw material for wood products and hence its applications (see 1.1 and 1.2). <p>Taking into account the age-class distribution of the property, the occurrence of specific events such as windfalls during the previous planning period, and</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>biodiversity measures implemented that may affect stores or growth, it is necessary to ensure as far as possible that the forest's carbon stores in live and dead trees are maintained or increased while also maintaining or increasing the growth of wood and its quality as raw wood."</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
8.5.2 The standard requires that areas that fulfil specific and recognised protective functions for society shall be mapped, and forest management plans and operations shall ensure the maintenance or enhancement of these functions.	YES	<p>PEFC DK 001-4,</p> <p>"5.2 (...) h) The records also relate to maps of:</p> <ul style="list-style-type: none"> - Any areas with drinking water interests designated by the municipality - Historic sites and cultural relics registered with the authorities - Forest access (roads and major paths) as well as special facilities for recreational activities (such as fire pits, basic campsites, forest playgrounds, scenic views, parking areas, etc.) (...)" <p>"3.13 Spillage of oil and other substances harmful to the environment during forest management activities (see Annex 3 – Environmental requirements for forest machinery and hand tools) and disposal of waste on forest land must always be avoided."</p> <p>"3.9 Activities impacting negatively must be regulated so as to protect areas of high natural preservation value and forests that are naturally of particular value."</p> <p>Assessment decision: Conformity</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Justification: The benchmark requirement can be considered as being sufficiently addressed.
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 DK 001-4, 3.11, 3.17</p> <p>“3.11 Felling, transport and regeneration techniques that protect the site and stand must be used in order to ensure favourable soil conditions and prevent damage to rare, delicate and special ecosystems and genetic reserves. Transport in the forest is carried out in a way that minimises damage. In particular, significant driving damage must be avoided through the use of machinery adapted to the locality and/or permanent tracks and the timing of operations.”</p> <p>“3.17 Wildlife management must be implemented so that the management objectives and versatility of the management of the forest property can be achieved in the short and long term. (...)”</p> <p>Assessment decision: onformity</p> <p>Justification: The benchmark requirement is</p>
8.5.4 The standard requires that special care shall be given to forestry operations in forest areas with water protection functions to avoid adverse effects on the quality and quantity of water resources. Inappropriate use of chemicals or other harmful substances or inappropriate silvicultural practices influencing water quality in a harmful way shall be avoided. Downstream water balance and water quality shall not be significantly affected by the operations.	YES	<p>PEFC DK 001-4, 3.10, 3.11, 3.9, 1.7, 1.8, 3.12</p> <p>“3.10 Attempts must be made to return to the natural state lakes, watercourses, bogs, heathlands, coastal meadows or marshes, water meadows and commons associated with the forest and where the hydrology has been altered through draining or other interventions, taking into account the economic consequences, including the stability of adjacent stands. The area of these habitats should increase within every five-year period, if the potential for this exists. Drainage of areas not drained previously is not allowed.”</p> <p>“3.11 Felling, transport and regeneration techniques that protect the site and</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>stand must be used in order to ensure favourable soil conditions and prevent damage to rare, delicate and special ecosystems and genetic reserves. Transport in the forest is carried out in a way that minimises damage. In particular, significant driving damage must be avoided through the use of machinery adapted to the locality and/or permanent tracks and the timing of operations.”</p> <p>“3.13 Spillage of oil and other substances harmful to the environment during forest management activities (see Annex 3 – Environmental requirements for forest machinery and hand tools) and disposal of waste on forest land must always be avoided.”</p> <p>“3.9 Activities impacting negatively must be regulated so as to protect areas of high natural preservation value and forests that are naturally of particular value.”</p> <p>“1.7 In areas that are not managed intensively, the use of fertilisers must be phased out through adaptation of land use systems so that:</p> <p>a) There is no use of fertilisers outside intensively managed areas where there are special natural considerations linked with the oligotrophic state of the area</p> <p>b) Fertilisers may only be used in connection with forest planting on oligotrophic sites where coniferous areas are to be converted into broadleaf areas and where this is critical for establishment of a usable young plantation</p> <p>c) The contribution of nutrients from the surrounding atmosphere must be taken into account (included) here</p> <p>d) The land use systems are adapted in such a way that no fertilisers have to be used (or ash has to be recycled). Exemptions from this must be covered by a statement from an expert with a knowledge of biological systems”</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>"1.8 The use of pesticides must be minimised in areas not managed intensively. Silvicultural alternatives and biological agents are preferred to the use of chemical pesticides. The following applies if pesticides are used:</p> <p>a) Vegetation cover that threatens the establishment of workable regeneration must be controlled with the use of pesticides as needed</p> <p>b) Use of soil and hormonal agents is not allowed</p> <p>c) Pesticides may exceptionally be used to control invasive species and pests where a well-documented need is present</p> <p>d) Where pesticides are used, this use is minimal in relation to achieving the desired effect."</p> <p>"3.12 When constructing forest roads, crossings and other forest infrastructures, it is necessary to ensure that the aquatic environment is not adversely affected and that the natural level and functions of watercourses are preserved. It is also necessary to ensure that areas that are as small as possible are exposed. Appropriate drainage of newly built roads must be ensured and maintained."</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement can be considered as essentially addressed.</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	YES	<p>PEFC DK 001-4, 3.12</p> <p>"3.12 When constructing forest roads, crossings and other forest infrastructures, it is necessary to ensure that the aquatic environment is not adversely affected and that the natural level and functions of watercourses are preserved. It is also necessary to ensure that areas that are as small as possible</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
maintained.		<p>are exposed. Appropriate drainage of newly built roads must be ensured and maintained.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</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.		<p>PEFC DK 001-4, chapter 6: “Collectively, the criteria form the foundation for long-term sustainable management of PEFC-certified forests, ensuring a balance between concerns for climate change mitigation, protection of biodiversity, stability of forests and adaptability to climate change, production of wood and other goods, long-term economy, environmental protection, landscape and cultural history and social considerations”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</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 DK 001-4, 4.1, 4.2</p> <p>“4.1 Good opportunities for recreational activities and nature experiences in the forest must be ensured. Outdoor arrangements must be in reasonable proportion to local needs, the size of the forest and economic opportunities, and take place with respect for ownership rights and the overall management objectives for the forest. In principle, this means that limited measures for recreational activities can be expected for small forests with few users, while more recreational measures can be expected for large forests with many users. There must be good accessibility, and established roads and paths must be maintained and expanded where applicable. Areas of particular recreational</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>value must also be designated. Recreational activities are taken into account when converting forest infrastructure. User groups that are in reasonable need of outdoor arrangements must be accommodated. A number of examples of measures that may improve recreational activities have been listed in <i>Annex 4 – Examples of measures that may improve recreational activities.</i></p> <p>“4.2 Information on opportunities for access and recreational activities must be readily available to the public. Availability must be in reasonable proportion to needs and the size and management objectives of the forest.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</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 DK 001-4, 4.4: “4.4 Historic sites and cultural heritage sites must be taken into account in management, and preservation of these must be ensured.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
8.6.4 The standard requires that management shall promote the long-term health and well-being of communities within or adjacent to the forest management area, where appropriate supported by engagement with local communities and indigenous peoples.	Yes	<p>PEFC DK 001-4, 5, 4.4</p> <p>“5 (...) Given the role that forest management can play in respect of rural development, planning must consider whether there are new opportunities for employment in forest management, taking into account the size of the forest. (...)”</p> <p>“4.1 Good opportunities for recreational activities and nature experiences in the forest must be ensured. Outdoor arrangements must be in reasonable proportion to local needs, the size of the forest and economic opportunities, and</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>take place with respect for ownership rights and the overall management objectives for the forest. In principle, this means that limited measures for recreational activities can be expected for small forests with few users, while more recreational measures can be expected for large forests with many users. There must be good accessibility, and established roads and paths must be maintained and expanded where applicable. Areas of particular recreational value must also be designated. Recreational activities are taken into account when converting forest infrastructure. User groups that are in reasonable need of outdoor arrangements must be accommodated. A number of examples of measures that may improve recreational activities have been listed in <i>Annex 4 – Examples of measures that may improve recreational activities.</i></p> <p>Assessment decision: onformity</p> <p>Justification: The benchmark requirement is</p>
8.6.5 The standard requires that the best use shall be made of forest-related experience and traditional knowledge, innovations and practices such as those of forest owners, NGOs, local communities, and indigenous peoples. Equitable sharing of the benefits arising from the utilization of such knowledge shall be encouraged.	YES	<p>PEFC DK 001-4, 4.3, 5:</p> <p>“4.3 The forest enterprise – owner and employees – must be willing to communicate with users and the local community with a view to ensuring reasonable:</p> <ul style="list-style-type: none"> ▪ Planning and deployment of recreational activities in the forest ▪ Utilisation of knowledge of the natural and cultural history of the forest” <p>“5 (...) Available knowledge and data from research institutions, forest monitoring and other advisory services, as appropriate, must be used in the planning process, and the grant schemes aimed at forestry that promote forest</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>policies must be considered. (...)</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
8.6.6 The standard requires that management shall give due regard to the role of forestry in local economies. Special consideration shall be given to new opportunities for training and employment of local people, including indigenous peoples.	Yes	<p>PEFC DK 001-4, 5 & Chapter 6</p> <p>Chapter 6: “ (...) The importance of forests for the population’s recreational activities is an asset essential to welfare, and this function is reinforced through dialogue with the surrounding community and by ensuring good accessibility and recreational opportunities in the certified forests.”</p> <p>“5 (...) Given the role that forest management can play in respect of rural development, planning must consider whether there are new opportunities for employment in forest management, taking into account the size of the forest (...)”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is addressed.</p>
8.6.7 The standard requires that forest management shall contribute to research activities and data collection needed for sustainable forest management or support relevant research activities carried out by other organisations, as appropriate.	Yes	<p>PEFC DK 001-4, 4.10: “The forest owner must be willing, to a reasonable extent, to make land and knowledge available for research activities and data collection at the request of research institutions.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
9. Performance evaluation		

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
9.1 Monitoring, measurement, analysis and evaluation		
9.1.1 The standard requires that monitoring of forest resources and evaluation of their management, including ecological, social and economic effects, shall be periodically performed, and results fed back into the planning process.	YES	<p>PEFC DK 001-4, Chapter 6, 5.2</p> <p>Chapter 6: “(...) Forest management must form a cycle of registrations and planning, implementation, monitoring and evaluation which makes it possible to assess the social, environmental and economic impact on [of?] forest management.(...)”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is essentially addressed.</p>
9.1.2 The standard requires that health and vitality of forests shall be periodically monitored, especially key biotic and abiotic factors that potentially affect health and vitality of forest ecosystems, such as pests, diseases, overgrazing and overstocking, fire, and damage caused by climatic factors, air pollutants or by forest management operations.	YES	<p>PEFC DK 001-4, 3.15: “The health and vitality of the forest must be monitored regularly in relation to external factors such as diseases, pests, overgrazing, fire or damage caused by climatic factors that may affect the health and vitality of the forest. The impact of such factors on forest management must be assessed when determining damage caused by such factors. Data from the National Forest Inventory (NFI) on the current state of forests and potential threats to forests, along with other information from the Information Service at the Department of Geosciences and Natural Resource Management, can be used as a basis for the evaluation.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
9.1.3 The standard requires that where it is the responsibility of the forest owner/manager and included in forest management, the use of non-wood forest products, including hunting and fishing, shall be regulated, monitored	YES	<p>PEFC DK 001-4, 3.17</p> <p>“3.17 Wildlife management must be implemented so that the management objectives and versatility of the management of the forest property can be</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
and controlled.		<p>achieved in the short and long term.”</p> <p>“1.4 Forest resources – both wood and non-wood products – must be utilised in a way that does not affect the long-term soil capability. For the production of wood, this is ensured through compliance with the other requirements stipulated in this standard. If non-wood products are to be utilised commercially, the owner must establish management guidelines so as to ensure that this does not affect the long-term soil capability.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is addressed.</p>
9.1.4 The standard requires that working conditions shall be regularly monitored and adapted as necessary.	NO	<p>PEFC DK 001-4, 4.6</p> <p>The forest owner shall regularly ensure that employees have the necessary instructions or qualifications to perform their duties in a safe and qualified manner and comply with the applicable forest management guidelines as well as legislation, including health and safety legislation. The forest owner can also use contracts to ensure that the contractor is able to document this. The forest owner must regularly ensure that employees receive the necessary further training in relation to the implementation of sustainable management.</p> <p>Assessment decision: Minor nonconformity</p> <p>Justification: The standard does not require that working conditions shall be regularly monitored and adapted as necessary. Instructions, qualifications, contractual agreements, training and documentation alone are not sufficient means of monitoring actual working conditions in the field, in the view of the assessor.</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
9.2 Internal audit		
9.2.1 Objectives		
The standard requires that an internal audit programme at planned intervals shall provide information on whether the management system		
<p>a) conforms to</p> <ul style="list-style-type: none"> • the organisation's requirements for its management system; • the requirements of the national sustainable forest management standard 	YES	<p>PEFC DK 001-4, 5.1: "Management objectives - The forest owner shall define an objective for sustainable forest management that is compliant with the standard and that relates to management opportunities and limitations given the size and extent of forest management. The forest owner shall conduct internal audits at least once a year to make it likely to meet the requirements of PEFC Denmark's Forest Management Standard – PEFC DK 001-4 and that they are effectively implemented and maintained.</p> <p>The objective shall include:</p> <ul style="list-style-type: none"> • An overall objective for the forest property • All relevant objectives, goals and targets for forest management <p>The internal audit shall include:</p> <ul style="list-style-type: none"> • The frequency, methods used and responsibilities, • Definition of the audit criteria and scope for each audit; • Selection of auditor • That results are reported to relevant management • That documentation is retained as evidence of the implementation of the audit programme and the audit results" <p>Assessment decision: Conformity Justification: The benchmark can be considered as essentially met.</p>
b) is effectively implemented and maintained.	YES	See above

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Assessment decision: Conformity Justification: The benchmark can be considered as essentially met.
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	<p>PEFC DK 001-4, 5.1: "Management objectives - The forest owner shall define an objective for sustainable forest management that is compliant with the standard and that relates to management opportunities and limitations given the size and extent of forest management. The forest owner shall conduct internal audits at least once a year to make it likely to meet the requirements of PEFC Denmark's Forest Management Standard – PEFC DK 001-4 and that they are effectively implemented and maintained.</p> <p>The objective shall include:</p> <ul style="list-style-type: none"> • An overall objective for the forest property • All relevant objectives, goals and targets for forest management <p>The internal audit shall include:</p> <ul style="list-style-type: none"> • The frequency, methods used and responsibilities, • Definition of the audit criteria and scope for each audit; • Selection of auditor • That results are reported to relevant management • That documentation is retained as evidence of the implementation of the audit programme and the audit results" <p>Assessment decision: Conformity Justification: The benchmark requirement is met.</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
b) define the audit criteria and scope for each audit;	YES	See 9.2.2a Assessment decision: Conformity Justification: The benchmark requirement is met.
c) select the auditors and conduct audits to ensure objectivity and the impartiality of the audit process;	NO	See 9.2.2a Assessment decision: Minor nonconformity Justification: Objectivity and impartiality of internal auditors are not addressed by the standard. It is understood that this can be difficult to meet in very small organisations, but it should be at least attempted to be addressed for the benchmark to be met.
d) ensure that the results of the audits are reported to relevant management;	YES	See 9.2.2a Assessment decision: Conformity Justification: The benchmark requirement is met.
e) retain documented information as evidence of the implementation of the audit programme and the audit results.	YES	See 9.2.2a Assessment decision: Conformity Justification: The benchmark requirement is met.
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 DK 001-4, 5.3: "Current records - The forest owner shall regularly supervise forest management, which includes preparing documented management records that clearly refer to the division of the forest map: (...)"

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>The forest owner shall conduct a management review at least once a year, which shall include:</p> <ul style="list-style-type: none"> • Information from results in audits, observations, nonconformities and corrective actions • The status of actions from previous management reviews • Opportunities for continual improvement • Any need for changes to the management system.” <p>Assessment decision: Conformity Justification: The benchmark requirement is met.</p>
b) changes in external and internal issues that are relevant to the management system;	YES	<p>See 9.3.1a</p> <p>Assessment decision: Conformity Justification: The benchmark requirement is met.</p>
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	<p>See 9.3.1a</p> <p>Assessment decision: Conformity Justification: The benchmark requirement is met.</p>
d) opportunities for continual improvement	YES	<p>See 9.3.1a</p> <p>Assessment decision: Conformity Justification: The benchmark requirement is met.</p>
9.3.2 The standard requires that the outputs of the management review shall include decisions related to	YES	<p>See 9.3.1a "The forest owner shall conduct a management review at least once a year, which shall include: (...) - Opportunities for continual improvement , - Any</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
continual improvement opportunities and any need for changes to the management system.		<p>need for changes to the management system.”</p> <p>Assessment decision: Conformity Justification: The benchmark requirement is essentially covered.</p>
9.3.3 The standard requires that documented information as evidence of the results of management reviews shall be retained.	YES	<p>See 9.3.1a “The forest owner shall conduct a management review at least once a year, which shall include: (...) The status of actions from previous management reviews”</p> <p>Assessment decision: Conformity Justification: The benchmark requirement is essentially covered.</p>
10. Improvement		
10.1 Nonconformity and corrective action		
10.1.1 The standard requires that when a nonconformity occurs, the organisation shall:		
<p>a) react to the nonconformity and, as applicable:</p> <p>i. take action to control and correct it;</p> <p>ii. deal with the consequences;</p>	YES	<p>PEFC DK 001-4, 5.9: “(...) Observations and non-conformances shall be defined and handled as follows: (...) 2. Minor non-conformance (...) Corrective measures is implementet and changes made to the management system, if necessary. Depending on the nature of the non-conformance, the forest owner may define a time limit for the corrective measure, which may be at the time of the next follow-up audit at the latest – but within no more than one year.”</p> <p>Assessment decision: Conformity Justification: The benchmark is met.</p>
b) evaluate the need for action to eliminate the causes of the nonconformity, in order that it does not	YES	<p>PEFC DK 001-4, 5.9: “(...) Whether the non-conformance is reasonably justified by special circumstances at the property assessed, determining the cause and if similar nonconformities exist. Non-conformances shall be indicated in the audit</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
<p>recur or occur elsewhere, by:</p> <p>i. reviewing the nonconformity;</p> <p>ii. determining the causes of the nonconformity;</p> <p>iii. determining if similar nonconformities exist, or could potentially occur;</p>		<p>report.</p> <p>If the non-conformance cannot be justified as stated, this is pointed out in writing, determining the cause and if similar non-conformities exist, or could potentially occur. Corrective measures is implementet and changes made to the management system, if necessary. Depending on the nature of the non-conformance, the forest owner may define a time limit for the corrective measure, which may be at the time of the next follow-up audit at the latest – but within no more than one year. The effectiveness of any corrective action taken should be reviewed.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark is met.</p>
c) implement any action needed;	YES	<p>PEFC DK 001-4, 5.9: “(...) Corrective measures is implementet and changes made to the management system, if necessary.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark is met.</p>
d) review the effectiveness of any corrective action taken;	YES	<p>PEFC DK 001-4, 5.9: “(...) The effectiveness of any corrective action taken should be reviewed. (...)”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark is met.</p>
e) make changes to the management system, if necessary.	YES	<p>PEFC DK 001-4, 5.9: “(...) Corrective measures is implementet and changes made to the management system, if necessary.”</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Assessment decision: Conformity Justification: The benchmark is met.
10.1.2 The standard requires that corrective actions shall be appropriate to the effects of the nonconformities encountered.	YES	<p>PEFC DK 001-4, 5.9: "(...) If the non-conformance cannot be justified as stated, this is pointed out in writing, determining the cause and if similar non-conformities exist, or could potentially occur. Corrective measures is implementet and changes made to the management system, if necessary. Depending on the nature of the non-conformance, the forest owner may define a time limit for the corrective measure, which may be at the time of the next follow-up audit at the latest – but within no more than one year. The effectiveness of any corrective action taken should be reviewed.</p> <p>The minor non-conformance will be upgraded to a major non-conformance if corrective measures for a minor non-conformance are not followed up within the specified time limit."</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark is met.</p>
10.1.3 The standard requires that the organisation shall retain documented information as evidence of:		
a) the nature of the nonconformities and any subsequent actions taken;	YES	<p>PEFC DK 001-4, 5.9: "(...) Whether the non-conformance is reasonably justified by special circumstances at the property assessed, determining the cause and if similar nonconformities exist. Non-conformances shall be indicated in the audit report.</p> <p>If the non-conformance cannot be justified as stated, this is pointed out in writing, determining the cause and if similar non-conformities exist, or could potentially occur. Corrective measures is implementet and changes made to the</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>management system, if necessary. Depending on the nature of the non-conformance, the forest owner may define a time limit for the corrective measure, which may be at the time of the next follow-up audit at the latest – but within no more than one year. The effectiveness of any corrective action taken should be reviewed.</p> <p>The minor non-conformance will be upgraded to a major non-conformance if corrective measures for a minor non-conformance are not followed up within the specified time limit.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is essentially addressed.</p>
b) the results of any corrective action.	YES	<p>PEFC DK 001-4, 5.9: “(...) Whether the non-conformance is reasonably justified by special circumstances at the property assessed, determining the cause and if similar nonconformities exist. Non-conformances shall be indicated in the audit report.</p> <p>If the non-conformance cannot be justified as stated, this is pointed out in writing, determining the cause and if similar non-conformities exist, or could potentially occur. Corrective measures is implementet and changes made to the management system, if necessary. Depending on the nature of the non-conformance, the forest owner may define a time limit for the corrective measure, which may be at the time of the next follow-up audit at the latest – but within no more than one year. The effectiveness of any corrective action taken should be reviewed.</p> <p>The minor non-conformance will be upgraded to a major non-conformance if corrective measures for a minor non-conformance are not followed up within</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>the specified time limit.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is essentially addressed.</p>
<p>10.2 Continual improvement</p> <p>The standard requires that the suitability, adequacy and effectiveness of the sustainable forest management system and the sustainable management of the forest shall be continuously improved.</p>	YES	<p>PEFC DK 001-4, 5: “Properties must formulate and maintain a forest planning system appropriate to the size and use of the forest so as to assess the social, environmental and economic impact on forest management. The planning system must include a cycle of calculations and planning, implementation, monitoring and evaluation as described below.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>

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

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	Assessment decision: Conformity Justification: Group certification is not implemented as regional certification in Denmark. The benchmark requirement is met.
b) other groups and/or	Yes	PEFC DK 003-5, Chapter "All owners of forest properties may apply for group certification under a group if they meet the group leader's requirements for participation in the group. A written agreement must be concluded on participation in group certification. As a basis, all the certifiable area of a forest property must be included in the agreement. By signing the agreement with the group leader, the group member undertakes to accept and comply with the following obligations as a minimum: <ol style="list-style-type: none"> 1) PEFC Denmark's Forest Management Standard – PEFC DK 001-4 2) Relevant legislation and provisions regulating forest management in Denmark 3) Control in the form of internal audits performed by the group leader and,

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>where appropriate, third-party audits performed by a certification body</p> <ol style="list-style-type: none"> 4) Responding effectively to all requests for relevant data, documents or other information from the group leader or certification body, whether in connection with formal audits, reviews or otherwise 5) Providing full cooperation and assistance with a view to satisfactory completion of internal audits, reviews, relevant routine questions or corrective measures 6) Implementation of relevant corrective and preventive measures established by the group leader 7) Upon request from stakeholders, the group leader must provide a summary of the forest property's plan – see <i>PEFC Denmark's Forest Management Standard – PEFC DK 001-4</i>, section 7.5 – which includes as a minimum the management objective defined in section 7.5.1. 8) Informing all group leaders/the certification body with which the forest is certified in the event of participation in several PEFC groups or maintenance of an individual PEFC certificate 9) When participating in several groups or maintaining an individual PEFC certificate, all non-conformances identified during internal/external audits must be reported to the other group leaders/the certification body with this the forest is certified" <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
c) whether there are any other specific circumstances which influence the implementation of the group management system.	YES	Assessment decision: Conformity Justification: No specific circumstances are defined. The benchmark requirement is met.
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 DK 003-5, 5.3: "Group entitys organise and manage group certification of forest properties and shall perform the following functions in that respect: (...) 9. Identification of relevant stakeholders and their legitimate needs and expectations in relation to the group management system." Assessment decision: Conformity Justification: The benchmark requirement is met.
b) the relevant expectations of these affected stakeholders.	YES	PEFC DK 003-5, 5.3: "Group entitys organise and manage group certification of forest properties and shall perform the following functions in that respect: (...) 9. Identification of relevant stakeholders and their legitimate needs and expectations in relation to the group management system." Assessment decision: Conformity Justification: The benchmark requirement is met.
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		

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
chapter 3:		
a) the group organisation and the elements of the group organisation (group entity and participant),	YES	<p>PEFC DK 003-5, Chapter 4</p> <p>Definitions given in <i>Terms and definitions – PEFC DK 007-3</i> are used for the purposes of this standard. However, it highlights:</p> <p>“Group organisation: A group of participants represented by the group entity for the purposes of implementation of the sustainable forest management standard and its certification. A binding written agreement shall be established between a participant and the group entity.</p> <p>Group leader: An organisation that organises and manages group certification of forest properties pursuant to the Danish PEFC scheme. The group leader represents all the group members in the group in relation to the certification body and is responsible for ensuring compliance with PEFC Denmark’s requirements.</p> <p>Group members: Forest properties that have signed a written agreement with a group leader on participation in a group certification and are prepared to comply with the requirements in the Danish PEFC scheme.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement I met.</p>
b) the certified area,	YES	<p>Se above, and the definition in PEFC DK 007-3</p> <p>Certified forest: A forest area to which a certification body or group has granted certification.</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Assessment decision: Conformity Justification: The benchmark requirement is met.
c) the group certificate and	YES	PEFC DK 007-3 Certificate: A document issued according to the rules of a certification system, providing confidence that a duly identified product, process or service is in conformity with a specified standard or other normative document. Group certification of forest management: Certification of forest management for a group of small and medium-sized forest owners under one certificate Assessment decision: Conformity Justification: The benchmark requirement is met.
d) the document confirming participation in group certification.	YES	PEFC DK 003-5, 5.4 “Agreement on participation in group certification - For each group member, there must be a written agreement between the forest owner (or an authorised representative of the forest owner) and the group leader to participate in group certification, thereby ensuring an organisational or contractual obligation to comply with <i>PEFC Denmark’s Forest Management Standard – PEFC DK 001-4.</i> ” Assessment decision: Conformity Justification: The document confirming participation in group certification is not defined in the standard’s definitions section, however it is sufficiently defined in 5.4.

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
<p>4.3.2 The standard requires that for the establishment of the scope for the group management system the boundaries and applicability of the group management system shall be determined.</p>	<p>YES</p>	<p>PEFC DK 003-5, 5.3</p> <p>“Group leaders organise and manage group certification of forest properties and must perform the following functions in that respect:</p> <ol style="list-style-type: none"> 1. Consider and approve requests from forest owners wishing to participate in PEFC group certification 2. Ensure that all applicants receive the information and guidance necessary to meet the requirements in PEFC Denmark’s Forest Management Standard – PEFC DK 001-4 3. Regularly notify group members about changes to PEFC Denmark’s Forest Management Standard PEFC DK 001-4 4. Use a contractual obligation and control to ensure that management of group members’ forests meets the requirements in PEFC Denmark’s Forest Management Standard – PEFC DK 001-4 5. If the group leader sells raw wood from group members, a description of this procedure must be provided which indicates the division of responsibilities between the parties 6. Develop and implement an annual internal audit programme for group members, as well as the group leader’s own central administrative function prior to the assessment by the certification body 7. Based on the results of the internal and external audits, to initiate corrective and preventive measures in the event of identified non-conformances in the associated forests and the group leader’s administrative system. The effectiveness of corrective and preventive measures is subsequently evaluated

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>8. Collect comments received from external parties, which are passed on uncensored to the certification body in the case of external audits</p> <p>9. Submit a summary of the plan for the forest property in question upon request: see PEFC Denmark's Forest Management Standard – PEFC DK 001-4, section 7.5, which includes the minimum management objective as defined in section 5.1 of PEFC Denmark's Forest Management Standard – PEFC DK 001-4. Confidential business and personal data may be omitted in the summary. Similarly, other information may be omitted in order to protect cultural values or delicate habitats</p> <p>10. Regularly notify the certification body and PEFC Denmark in writing of issued, terminated, suspended and withdrawn group memberships</p> <p>11. Maintain a register of certified forest properties, containing the following information for each individual group member:</p> <ul style="list-style-type: none"> - Name of the forest property - The legal owner's name and address - Name of a contact person - Email (contact person) - Date of group membership - Membership expiry date - Membership number - Certified area " <p>Assessment decision: Conformity</p> <p>Justification: The scope of the management system can be considered as being essentially defined through the definition of the group leader's functions in 5.3.</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
4.3.3 The standard shall define which requirements of the sustainable forest management standard may be fulfilled on group level.	YES	<p>DK 003-5, chapter 5.2:</p> <p>“It shall be demonstrated that the enterprise has established a management system in accordance with this standard (sections 5.3 – 5.9) and that all group members meet the requirements of PEFC Denmark’s Forest Management Standard – PEFC DK 001-4.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The standard does not define which requirements of the sustainable forest management standard may be fulfilled on group level. DK 003-5 requires that all requirements of PEFC DK 001-4 are met at the level of the group participant. The benchmark requirement is met.</p>
4.3.4 The standard requires that the scope shall be made available as documented information.	YES	<p>PEFC DK 003-5, 5.5</p> <p>“The group leader must initiate and maintain procedures to control all documents and records required according to this standard so that: (...)</p> <p>The documents must be readily legible, dated (with update dates) and easily recognisable. Procedures and responsibilities must be established and maintained, taking into account the creation and amendment of various documents.</p> <p>The following procedures/routines must be described as a minimum:</p> <ul style="list-style-type: none"> - Conclusion of agreements on participation in group certification (membership of the group) - Guidelines for obtaining documentation from group members as required in PEFC Denmark’s Forest Management Standard – PEFC DK 001-4, section 7.5 - Procedure in connection with the transfer of forest properties or parts of forest properties

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<ul style="list-style-type: none"> - Termination of an agreement on participation in the group - Collection of comments received from external parties - Planning and implementation of internal audits - Dealing with non-conformances and corrective measures (Annex 1) - Document management and filing, including a register of group members, as required in section 5.3, regular reporting of new agreements to PEFC Denmark and filing of documents that are or may be of significance to the implementation of certification (see the example in Annex 2 – Example of filing rules) - Other routines of significance to administration of group certification” <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is essentially addressed.</p>
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	<p>PEFC DK 003-5, 5.6: “The group entity shall conduct internal audits of group members at least once a year to make it likely that the individual group members will meet the requirements of <i>PEFC Denmark’s Forest Management Standard – PEFC DK 001-4.</i>”</p> <p>5.2: “Minimum management system requirements - PEFC certification of group entity requires the use of a management system. The system shall at least be able to handle and manage the routine and documentation requirements imposed on the group entity in this document.</p> <p>It shall be demonstrated that the enterprise has established a management system in accordance with this standard (sections 5.3 – 5.9) and that all group members meet the requirements of PEFC Denmark’s Forest Management Standard – PEFC DK 001-4. The enterprise is also committed to continuously improve and evaluate the management system based on the results of an</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>ongoing internal monitoring programme and ensuring that the members of the group continuously improve their forest management.</p> <p>The enterprise shall be capable of demonstrating its ability to collect and analyse data from all group members, including the enterprise's authority and ability to initiate changes among individual group members if necessary."</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
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	<p>PEFC DK 003-5, 5.3</p> <p>"5. If the group leader sells raw wood from group members, a description of this procedure must be provided which indicates the division of responsibilities between the parties. 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."</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
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:		

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
a) to implement and maintain an effective management system covering all participants of the group;	YES	<p>PEFC DK 003-5, 5.2</p> <p>“PEFC certification of group leaders requires the use of a management system. The system must at least be able to handle and manage the routine and documentation requirements imposed on the group leader in this document.</p> <p>It must be demonstrated that the enterprise has established a management system in accordance with this standard (sections 5.3 – 5.9) and that all group members meet the requirements of PEFC Denmark’s Forest Management Standard – PEFC DK 001-4. The enterprise is also obliged to go on improving the management system and ensuring that the members of the group go on improving their forest management.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
b) to represent the group organisation in the certification process, including in communications and relationships with the certification body, submission of an application for certification, and contractual relationship with the certification body;	YES	<p>PEFC DK 003-5, 5.3</p> <p>“Group leaders organise and manage group certification of forest properties and must perform the following functions in that respect: (...) 13: Represent the group organisation in the certification process, including in communications and relationships with the certification body, submission of an application for certification, and contractual relationship with the certification body (...)”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
c) to establish written procedures for the management of the group organisation;	YES	<p>PEFC DK 003-5, 5.5</p> <p>“The group leader must initiate and maintain procedures to control all documents and records required according to this standard (...)”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
d) to establish written procedures for the acceptance of new participants of the group organisation. These acceptance procedures shall cover at least the verification of the applicant’s information about contact details, clear identification of their forest property and its/their size(s)	NO	<p>PEFC DK 003-5, 5.5, 5.3</p> <p>“5.5 (...) The following procedures/routines must be described as a minimum:</p> <ul style="list-style-type: none"> - Conclusion of agreements on participation in group certification (membership of the group) - Guidelines for obtaining documentation from group members as required in PEFC Denmark’s Forest Management Standard – PEFC DK 001-4, section 7.5 [?] (...) - Document management and filing, including a register of group members, as required in section 5.3, regular reporting of new agreements to PEFC Denmark and filing of documents that are or may be of significance to the implementation of certification (see the example in Annex 2 – Example of filing rules) - Other routines of significance to administration of group certification” <p>“5.3 Group leaders organise and manage group certification of forest properties and must perform the following functions in that respect:</p> <ol style="list-style-type: none"> 1. Consider and approve requests from forest owners wishing to participate in PEFC group certification [<i>Comment PEFC Denmark: “In this pct applicant’s</i>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p><i>information and contact details are verified.”] (...)</i></p> <p>11. Maintain a register of certified forest properties, containing the following information for each individual group member:</p> <ul style="list-style-type: none"> - Name of the forest property - The legal owner’s name and address - Name of a contact person - Email (contact person) - Date of group membership - Membership expiry date - Membership number - Certified area” <p>Assessment decision: Conformity</p> <p>Justification: The benchmark can be considered as met.</p>
e) to establish written procedures for the suspension and exclusion of participants who do not correct/close nonconformities. Group participants excluded from any certification group based on nonconformities cannot be accepted within 12 months after exclusion	YES	<p>PEFC DK 003-5, 5.4, 5.5, 5.9</p> <p>“5.4 (...) 5. The agreement must describe rights for the group leader to exclude the group member from participation in the group certification in the event of repeated major non-conformances in respect of <i>PEFC Denmark’s Forest Management Standard – PEFC DK 001-4</i>”</p> <p>“5.5 (...) The following procedures/routines must be described as a minimum: (...) - Termination of an agreement on participation in the group (...) - Dealing with non-conformances and corrective measures (Annex 1)”</p> <p>“5.9 (...) The group leader must establish procedures for suspension and withdrawal of agreements. (...) Group members who have had their</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>memberships withdrawn cannot be admitted to a group scheme within 12 months.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
<p>f) to keep documented information of:</p> <p>i. the group entity and participants’ conformity with the requirements of the sustainable forest management standard, and other applicable requirements of the forest certification system,</p> <p>ii. all participants, including their contact details, identification of their forest property and its/their size(s),</p> <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 DK 003-5, 5.3, 5.5</p> <p>“5.3 Group leaders organise and manage group certification of forest properties and must perform the following functions in that respect: (...)</p> <p>4. Use a contractual obligation and control to ensure that management of group members’ forests meets the requirements in PEFC Denmark’s Forest Management Standard – PEFC DK 001-4 (...)</p> <p>7. Based on the results of the internal and external audits, to initiate corrective and preventive measures in the event of identified non-conformances in the associated forests and the group leader’s administrative system. The effectiveness of corrective and preventive measures is subsequently evaluated (...)</p> <p>11. Maintain a register of certified forest properties, containing the following information for each individual group member:</p> <ul style="list-style-type: none"> - Name of the forest property - The legal owner’s name and address - Name of a contact person - Email (contact person) - Date of group membership - Membership expiry date - Membership number

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>- Certified area"</p> <p>"5.5 Document control - The group leader must initiate and maintain procedures to control all documents and records required according to this standard (...)</p> <p>The following procedures/routines must be described as a minimum:</p> <ul style="list-style-type: none"> - Conclusion of agreements on participation in group certification (membership of the group) - Guidelines for obtaining documentation from group members as required in PEFC Denmark's Forest Management Standard – PEFC DK 001-4, section 7.5 - Procedure in connection with the transfer of forest properties or parts of forest properties - Termination of an agreement on participation in the group - Collection of comments received from external parties - Planning and implementation of internal audits - Dealing with non-conformances and corrective measures (Annex 1) - Document management and filing, including a register of group members, as required in section 5.3, regular reporting of new agreements to PEFC Denmark and filing of documents that are or may be of significance to the implementation of certification (see the example in Annex 2 – Example of filing rules) - Other routines of significance to administration of group certification" <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</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	YES	<p>PEFC DK 003-5, 5.4</p> <p>"For each group member, there must be a written agreement between the forest owner (or an authorised representative of the forest owner) and the</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
<p>written contract or other written agreement with all participants covering the right of the group entity to implement and enforce any corrective or preventive measures, and to initiate the exclusion of any participant from the scope of certification in the event of nonconformity with the sustainable forest management standard;</p> <p>Note: The requirements for “participant’ commitment” and “written contract or other written agreement with all participants” may also be satisfied by the commitment of and written agreement of a pre-existing organisation or group or the members participation, such as a forest owners’/managers’ association, SFM programme and submission to tax programming, where the organisation can demonstrate that it has a legal mandate to represent the participants and where its commitment and the terms and conditions of the contract are enforceable.</p>		<p>group leader to participate in group certification, thereby ensuring an organisational or contractual obligation to comply with <i>PEFC Denmark’s Forest Management Standard – PEFC DK 001-4</i>. The following matters must be observed in connection with the agreement:</p> <ol style="list-style-type: none"> 1. The agreement shall be signed by the forest owner or an authorised representative of the forest owner 2. The group member shall be in possession of information that indicates what certification involves 3. The group member shall undertake to comply with Danish legislation of significance to forest management, <i>PEFC Denmark’s Forest Management Standard – PEFC DK 001-4</i>, and follow the group leader’s other instructions in order to maintain membership of the group 4. The agreement must be valid for at least one year 5. The agreement must describe rights for the group leader to exclude the group member from participation in the group certification in the event of repeated major non-conformances in respect of <i>PEFC Denmark’s Forest Management Standard – PEFC DK 001-4</i> 6. The group leader must collect information from the group member at appropriate intervals concerning matters relating to the management of the forest. This information must be collected before renewal of the agreement, as a minimum 7. The group member must agree to third-party inspections 8. Two copies of the agreement are compiled; one for the group member

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>and one for the group leader</p> <p>The group leader may impose requirements for participation in the group other than those set out in this standard and in <i>PEFC Denmark's Forest Management Standard – PEFC DK 001-4.</i></p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
h) to provide all participants with a document confirming participation in the group forest certification;	YES	<p>PEFC DK 003-5, 5.4</p> <p>“8.Two copies of the agreement are compiled; one for the group member and one for the group leader”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met</p>
i) to provide all participants with information and guidance required for the effective implementation and maintenance of the sustainable forest management standard and other applicable requirements of the forest certification system;	YES	<p>PEFC DK 003-5, 5.3, 5.4</p> <p>“5.3 Group leaders organise and manage group certification of forest properties and must perform the following functions in that respect:</p> <p>2. Ensure that all applicants receive the information and guidance necessary to meet the requirements in PEFC Denmark's Forest Management Standard – PEFC DK 001-4</p> <p>3. Regularly notify group members about changes to PEFC Denmark's Forest Management Standard PEFC DK 001-4”</p> <p>“5.4 (...) 2. The group member shall be in possession of information that</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>indicates what certification involves"</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
j) to address nonconformities reported from group members which were identified under other PEFC certifications than the particular group certification and to ensure implementation with all group members;	YES	<p>PEFC DK 003-5, 6</p> <p>"By signing the agreement with the group leader, the group member undertakes to accept and comply with the following obligations as a minimum: (...)</p> <p>9. When participating in several groups or maintaining an individual PEFC certificate, all non-conformances identified during internal/external audits must be reported to the other group leaders/the certification body with this the forest is certified"</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
k) to operate an internal monitoring programme that provides for the evaluation of the participants' conformity with the certification requirements;	YES	<p>PEFC DK 003-5, 5.6</p> <p>The group leader must conduct internal audits of their own management system at least once a year, covering all the requirements in these guidelines, as well as implementing corrective and preventive measures if required.</p> <p>5.2: "Minimum management system requirements - PEFC certification of group entitys requires the use of a management system. The system shall at least be able to handle and manage the routine and documentation requirements imposed on the group entity in this document.</p> <p>It shall be demonstrated that the enterprise has established a management system in accordance with this standard (sections 5.3 – 5.9) and that all group members meet the requirements of PEFC Denmark's Forest Management</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>Standard – PEFC DK 001-4. The enterprise is also committed to continuously improve and evaluate the management system based on the results of an ongoing internal monitoring programme and ensuring that the members of the group continuously improve their forest management.</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is essentially addressed.</p>
l) to operate an annual internal audit programme covering both group members and group entity;	YES	<p>PEFC DK 003-5, 5.6</p> <p>The group leader must conduct internal audits of their own management system at least once a year, covering all the requirements in these guidelines, as well as implementing corrective and preventive measures if required.</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
m) to operate a management review of the group forest certification and acting on the results from the review;	YES	<p>PEFC DK 003-5, 5.7</p> <p>“Management control - The enterprise’s management must review compliance with the applicable requirements from PEFC Denmark at least once a year.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</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	YES	<p>PEFC DK 003-5, 5.3: “The group entity’s activities - Group entitys organise and manage group certification of forest properties and shall perform the following functions in that respect: (...)”</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
information; allowing access to the forest area covered by the group organisation and other facilities, whether in connection with formal audits or reviews or otherwise related or with implications for the management system.		<p>11. Provide full co-operation and assistance in responding effectively to all requests from the certification body, accreditation body, PEFC International or PEFC Denmark for relevant data, documentation or other information; allowing access to the forest area covered by the group organisation and other facilities, whether in connection with formal audits or reviews or otherwise related or with implications for the management system.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
<p>5.1.2 Function and responsibilities of participants</p> <p>The standard requires that the following functions and responsibilities of the participants shall be specified:</p>		
<p>a) To provide the group entity with a binding written agreement, including a commitment on conformity with the sustainable forest management standard and other applicable requirements of the forest certification system; group participants excluded from any certification group cannot apply for group membership within 12 months after exclusion.</p> <p>Note: The requirement for “written agreement” and participants’ “commitment” is also satisfied by the commitment of and written agreement of a pre-existing organisation or group or the members participation, such as a forest owners’/managers’ association, SFM programme and submission to tax programming, where the organisation can demonstrate that it has a legal mandate to represent the participants and where its commitment and the terms and</p>	YES	<p>PEFC DK 003-5, 6, 5.9</p> <p>“6 (...) By signing the agreement with the group leader, the group member undertakes to accept and comply with the following obligations as a minimum:</p> <p><i>1. PEFC Denmark’s Forest Management Standard – PEFC DK 001-4</i></p> <p>2. Relevant legislation and provisions regulating forest management in Denmark (...)”</p> <p>“5.9 (...) Group members who have had their memberships withdrawn cannot be admitted to a group scheme within 12 months.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
conditions of the contract are enforceable.		
b) To provide the group entity with information about previous group participation.	YES	<p>PEFC DK 003-5, Chapter 6:</p> <p>“9. When participating in several groups or maintaining an individual PEFC certificate, all non-conformances identified during internal/external audits shall be reported to the other group entitys/the certification body with this the forest is certified</p> <p>10) Informing the group entity about previous group participation.</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
c) to comply with the sustainable forest management standard and other applicable requirements of the certification system as well as with the requirements of the management system;	YES	<p>PEFC DK 003-5, 6, 5.9</p> <p>“6 (...) By signing the agreement with the group leader, the group member undertakes to accept and comply with the following obligations as a minimum:</p> <p><i>1. PEFC Denmark’s Forest Management Standard – PEFC DK 001-4</i></p> <p>2. Relevant legislation and provisions regulating forest management in Denmark</p> <p>3. Control in the form of internal audits performed by the group leader and, where appropriate, third-party audits performed by a certification body</p> <p>4. Responding effectively to all requests for relevant data, documents or other information from the group leader or certification body, whether in connection with formal audits, reviews or otherwise</p> <p>5. Providing full cooperation and assistance with a view to satisfactory completion of internal audits, reviews, relevant routine questions or corrective measures</p> <p>6. Implementation of relevant corrective and preventive measures established</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>by the group leader</p> <p>7. Upon request from stakeholders, the group leader must provide a summary of the forest property's plan – see PEFC Denmark's Forest Management Standard – PEFC DK 001-4, section 7.5 – which includes as a minimum the management objective defined in section 7.5.1.</p> <p>8. Informing all group leaders/the certification body with which the forest is certified in the event of participation in several PEFC groups or maintenance of an individual PEFC certificate</p> <p>9. When participating in several groups or maintaining an individual PEFC certificate, all non-conformances identified during internal/external audits must be reported to the other group leaders/the certification body with this the forest is certified"</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
d) to provide full co-operation and assistance in responding effectively to all requests from the group entity, or certification body for relevant data, documentation or other information; allowing access to the forest and other facilities, whether in connection with formal audits or reviews or otherwise related or with implications for the management system;	YES	<p>PEFC DK 003-5, 6 & PEFC DK 001-4, 5</p> <p>PEFC DK 003-5, 6: "(...) By signing the agreement with the group leader, the group member undertakes to accept and comply with the following obligations as a minimum: (...)</p> <p>4) Responding effectively to all requests for relevant data, documents or other information from the group entity or certification body; allowing access to the forest area covered by the group organisation and other facilities whether in connection with formal audits, reviews or otherwise</p> <p>5) Providing full cooperation and assistance with a view to satisfactory completion of internal audits, reviews, relevant routine questions or corrective</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>measures”</p> <p>PEFC DK 001-4, 5: “(...) By signing the agreement, the forest owner undertakes to accept and comply with the following obligations: (..) 3) Control through third-party auditing by a certification body”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
e) to inform the group entity about nonconformities identified under other PEFC certifications than the particular group certification.	YES	<p>PEFC DK 003-5, 6</p> <p>“(...) By signing the agreement with the group leader, the group member undertakes to accept and comply with the following obligations as a minimum: (...)</p> <p>9. When participating in several groups or maintaining an individual PEFC certificate, all non-conformances identified during internal/external audits must be reported to the other group leaders/the certification body with this the forest is certified”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
f) to implement relevant corrective and preventive actions established by the group entity.	YES	<p>PEFC DK 003-5, Chapter 6</p> <p>“(...) By signing the agreement with the group leader, the group member undertakes to accept and comply with the following obligations as a minimum: (...)</p> <p>6) Implementation of relevant corrective and preventive measures established</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>by the group leader”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
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;	NO	<p>PEFC DK 003-5, 5.4: “For each group member, there must be a written agreement between the forest owner (or an authorised representative of the forest owner) and the group leader to participate in group certification, thereby ensuring an organisational or contractual obligation to comply with <i>PEFC Denmark’s Forest Management Standard – PEFC DK 001-4.</i>”</p> <p>PEFC DK 003-5, 5.2: “It shall be demonstrated that the enterprise has established a management system in accordance with this standard (sections 5.3 – 5.9) and that all group members meet the requirements of PEFC Denmark’s Forest Management Standard – PEFC DK 001-4. The enterprise is also obliged to continuously improve the management system and ensuring that the members of the group go on improving their forest management.”</p> <p>Assessment decision: Minor nonconformity</p> <p>Justification: The standard does not require a commitment from the group entity to comply with any of the Danish PEFC system’s requirements.</p>
b) to integrate the group certification requirements in the group management system;	NO	<p>PEFC DK 003-5, 5.4: "For each group member, there must be a written agreement between the forest owner (or an authorised representative of the forest owner) and the group leader to participate in group certification, thereby ensuring an organisational or contractual obligation to comply with <i>PEFC</i></p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p><i>Denmark's Forest Management Standard – PEFC DK 001-4.</i></p> <p>PEFC DK 003-5, 5.2: "It shall be demonstrated that the enterprise has established a management system in accordance with this standard (sections 5.3 – 5.9) and that all group members meet the requirements of PEFC Denmark's Forest Management Standard – PEFC DK 001-4. The enterprise is also obliged to continuously improve the management system and ensuring that the members of the group go on improving their forest management."</p> <p>Assessment decision: Minor nonconformity</p> <p>Justification: The standard does not require a commitment from the group entity to integrate PEFC DK 003-5 requirements in its management system.</p>
c) to continuously improve the group management system;	YES	<p>PEFC DK 003-5, 5.2: "The enterprise is also committed to continuously improve and evaluate the management system based on the results of an ongoing internal monitoring programme and ensuring that the members of the group continuously improve their forest management."</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
d) to continuously support the improvement of the sustainable management of the land/forests by the participants.	YES	<p>PEFC DK 003-5, 5.2: "The enterprise is also committed to continuously improve and evaluate the management system based on the results of an ongoing internal monitoring programme and ensuring that the members of the group continuously improve their forest management."</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
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.	NO	<p>PEFC DK 003-5 5.2</p> <p>“(…) The group leader must have a described organisational structure and commitment in relation to their enterprise as a group administrator; in the form of an organisation chart, for example. The group leader must define and communicate roles, procedures, rights and duties for the work of a group leader. The group leader is obliged, upon request, to publish the group’s general policy in relation to group members’ obligations.”</p> <p>Assessment decision: Minor nonconformity</p> <p>Justification: The standard does not require that the commitment of the group entity is publicly available as documented information upon request.</p>
5.2.3 The standard requires that the participants shall provide a commitment		
a) to follow the rules of the management system;	YES	<p>PEFC DK 003-5, 5.4, 6</p> <p>“5.4 For each group member, there must be a written agreement between the forest owner (or an authorised representative of the forest owner) and the group leader to participate in group certification, thereby ensuring an organisational or contractual obligation to comply with <i>PEFC Denmark’s Forest Management</i> Standard PEFC DK 001-4. The following matters must be observed in connection with the agreement: (…)</p> <p>3. The group member shall undertake to comply with Danish legislation of significance to forest management, <i>PEFC Denmark’s Forest Management Standard – PEFC DK 001-4</i>, and follow the group leader’s other instructions in order to maintain membership of the group”</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>“6 (...) By signing the agreement with the group leader, the group member undertakes to accept and comply with the following obligations as a minimum:</p> <ol style="list-style-type: none"> 1) PEFC Denmark’s Forest Management Standard – PEFC DK 001-4 2) Relevant legislation and provisions regulating forest management in Denmark 3) Control in the form of internal audits performed by the group leader and, where appropriate, third-party audits performed by a certification body 4) Responding effectively to all requests for relevant data, documents or other information from the group leader or certification body, whether in connection with formal audits, reviews or otherwise 5) Providing full cooperation and assistance with a view to satisfactory completion of internal audits, reviews, relevant routine questions or corrective measures 6) Implementation of relevant corrective and preventive measures established by the group leader 7) Upon request from stakeholders, the group leader must provide a summary of the forest property’s plan – see PEFC Denmark’s Forest Management Standard – PEFC DK 001-4, section 7.5 – which includes as a minimum the management objective defined in section 7.5.1. 8) Informing all group leaders/the certification body with which the forest is certified in the event of participation in several PEFC groups or maintenance of an individual PEFC certificate 9) When participating in several groups or maintaining an individual PEFC certificate, all non-conformances identified during internal/external audits must be reported to the other group leaders/the certification body with this the forest is certified” <p>Assessment decision: Conformity</p> <p>Justification: The agreement can be considered a commitment to follow the</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		rules of the management system.
b) to implement the requirements of the sustainability standard in their operations in their area.	YES	<p>Se above</p> <p>Assessment decision: Conformity</p> <p>Justification: The agreement can be considered a commitment to follow the rules of the management system.</p>
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	<p>PEFC DK 003-5, 5.2</p> <p>“If a group organisation plans any changes in the group management system, these changes shall be included in a group management plan.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
6.2 The standard requires that if a group organisation decides to fulfil requirements of the sustainable forest management standard on the group level, these requirements shall be considered in a group management plan.	N/A	<p>PEFC DK 003-5, 5.2</p> <p>It must be demonstrated that the enterprise has established a management system in accordance with this standard (sections 5.3 – 5.9) and that all group members meet the requirements of PEFC Denmark’s Forest Management Standard – PEFC DK 001-4. The enterprise is also obliged to go on improving the management system and ensuring that the members of the group go on improving their forest management</p> <p>Assessment decision: N/A</p> <p>Justification: The standard does not specify any requirements of PEFC DK 001-4</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		that are to be met 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	<p>PEFC DK 003-5, 5.2</p> <p>“(…) The management must ensure sufficient resources are available to allow the work to be carried out.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
7.2 The standard shall define the necessary competence of persons doing work in the group management system.	YES	<p>PEFC DK 003-5, 5.1</p> <p>“For an enterprise to be designated as a group leader, it must:</p> <ul style="list-style-type: none"> - Be registered as a legal entity - Have a day-to-day management <p>The group leader must ensure that decisions on the inclusion of group members in the group and conducting the internal audit are carried out by a forest management expert with professional expertise in forest management and the environmental impact of forest management and three years of practical experience with Danish forest management.</p> <p>Note: Professional expertise in forest management and the environmental impact of forest management can be documented by staff who have relevant training and professional experience in forest management in relation to forest management. Master of Forestry, Forest and Landscape Engineer, Biologist,</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>Forest technician or similar are all potentially relevant programmes”.</p> <p>Assessment decision: Conformity Justification: The benchmark requirement is met.</p>
7.3 The standard requires that communication processes shall be in place to raise the awareness of participants concerning:	YES	<p>PEFC DK 003-5, 5.4</p> <p>“(…) 2. The group member shall be in possession of information that indicates what certification involves”</p> <p>Assessment decision: Conformity Justification: The benchmark requirement can be considered as met</p>
a) the group management policy;	YES	<p>PEFC DK 003-5, 5.3</p> <p>“(…) If accepted by the individual group members, it is possible for the group leader to establish a policy and objectives for forest management as required in section 7.5 of <i>PEFC Denmark’s Forest Management Standard – PEFC DK 001-4</i>, applicable in general to the members of a group”</p> <p>Assessment decision: Conformity Justification: 5.3 implies communication between group entity and participant with regard to a policy.</p>
b) the requirements of the sustainable forest management standard;	YES	<p>PEFC DK 003-5, 5.3</p> <p>“Group leaders organise and manage group certification of forest properties and must perform the following functions in that respect: (...)”</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>2. Ensure that all applicants receive the information and guidance necessary to meet the requirements in PEFC Denmark's Forest Management Standard – PEFC DK 001-4</p> <p>3. Regularly notify group members about changes to PEFC Denmark's Forest Management Standard PEFC DK 001-4"</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</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 DK 003-5,</p> <p>"Minimum management system requirements (...) The enterprise is also obliged to go on improving the management system and ensuring that the members of the group go on improving their forest management."</p> <p>Assessment decision: Minor nonconformity</p> <p>Justification: The benchmark requirement is not met.</p>
d) the implications of not conforming with the group management system requirements.	YES	<p>PEFC DK 003-5, 5.4</p> <p>"5. The agreement must describe rights for the group leader to exclude the group member from participation in the group certification in the event of repeated major non-conformances in respect of PEFC Denmark's Forest Management Standard – PEFC DK 001-4"</p> <p>Assessment decision: onformity</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Justification: The benchmark requirement is
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 DK 003-5, 5.3, 6</p> <p>“5.3 (...) Group leaders organise and manage group certification of forest properties and must perform the following functions in that respect:</p> <ol style="list-style-type: none"> 1. Consider and approve requests from forest owners wishing to participate in PEFC group certification 2. Ensure that all applicants receive the information and guidance necessary to meet the requirements in <i>PEFC Denmark’s Forest Management Standard – PEFC DK 001-4</i> 3. Regularly notify group members about changes to <i>PEFC Denmark’s Forest Management Standard PEFC DK 001-4</i> 4. Use a contractual obligation and control to ensure that management of group members’ forests meets the requirements in <i>PEFC Denmark’s Forest Management Standard – PEFC DK 001-4</i> 5. If the group leader sells raw wood from group members, a description of this procedure must be provided which indicates the division of responsibilities between the parties 6. Develop and implement an annual internal audit programme for group members, as well as the group leader’s own central administrative function prior to the assessment by the certification body 7. Based on the results of the internal and external audits, to initiate corrective and preventive measures in the event of identified non-conformances in the associated forests and the group leader’s administrative system. The effectiveness of corrective and preventive measures is subsequently evaluated 8. Collect comments received from external parties, which are passed on uncensored to the certification body in the case of external audits 9. Submit a summary of the plan for the forest property in question upon

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>request: see <i>PEFC Denmark's Forest Management Standard – PEFC DK 001-4</i>, section 7.5, which includes the minimum management objective as defined in section 5.1 of <i>PEFC Denmark's Forest Management Standard – PEFC DK 001-4</i>. Confidential business and personal data may be omitted in the summary. Similarly, other information may be omitted in order to protect cultural values or delicate habitats</p> <p>10. Regularly notify the certification body and PEFC Denmark in writing of issued, terminated, suspended and withdrawn group memberships</p> <p>11. Maintain a register of certified forest properties, containing the following information for each individual group member: (...)”</p> <p>“6 (...) By signing the agreement with the group leader, the group member undertakes to accept and comply with the following obligations as a minimum:</p> <ol style="list-style-type: none"> 1) PEFC Denmark's Forest Management Standard – PEFC DK 001-4 2) Relevant legislation and provisions regulating forest management in Denmark 3) Control in the form of internal audits performed by the group leader and, where appropriate, third-party audits performed by a certification body 4) Responding effectively to all requests for relevant data, documents or other information from the group leader or certification body, whether in connection with formal audits, reviews or otherwise 5) Providing full cooperation and assistance with a view to satisfactory completion of internal audits, reviews, relevant routine questions or corrective measures 6) Implementation of relevant corrective and preventive measures established by the group leader 7) Upon request from stakeholders, the group leader must provide a summary of the forest property's plan – see <i>PEFC Denmark's Forest Management Standard – PEFC DK 001-4</i>, section 7.5 – which includes as a minimum the management objective defined in section 7.5.1. 8) Informing all group leaders/the certification body with which the forest is

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>certified in the event of participation in several PEFC groups or maintenance of an individual PEFC certificate</p> <p>9) When participating in several groups or maintaining an individual PEFC certificate, all non-conformances identified during internal/external audits must be reported to the other group leaders/the certification body with this the forest is certified</p> <p>If accepted by the individual group members, it is possible for the group leader to establish a policy and objectives for forest management as required in section 7.5 of <i>PEFC Denmark's Forest Management Standard – PEFC DK 001-4</i>, applicable in general to the members of a group.“</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
b) when to communicate;	YES	<p>See above</p> <p>Assessment decision: Conformity</p> <p>Justification: As communication is generally linked to certain events, this can be understood as meeting this benchmark.</p>
c) with whom to communicate;	YES	<p>See above</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
d) how to communicate.	YES	<p>PEFC Denmark comment: <i>“Communication and information is exchanged in an efficient way as can be seen in the paragraph underneath. PEFC Denmark find that communication is generally linked to certain events, the ways to communicate effectinly are plentiful and to define any exact way to communicate would</i></p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p><i>narrow efficient communication unnecessarily."</i></p> <p>PEFC DK 003-1, 6: "By signing the agreement with the group leader, the group member undertakes to accept and comply with the following obligations as a minimum: (...) 4) Responding effectively to all requests for relevant data, documents or other information from the group leader or certification body; allowing access to the forest area covered by the group organisation and other facilities whether in connection with formal audits, reviews or otherwise"</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement can be considered as essentially addressed.</p>
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	<p>PEFC DK 003-5, 5.3: "Group leaders organise and manage group certification of forest properties and shall perform the following functions in that respect: (...)</p> <p>14. Establish procedures and mechanisms for resolving complaints and disputes to group management and sustainable forest management operations and for suspension and withdrawal of agreements"</p> <p>PEFC DK 003-5, 5.9: "(...) The group leader shall establish procedures and mechanisms for resolving complaints and disputes to group management and sustainable forest management operations and for suspension and withdrawal of agreements."</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
7.6 The standard requires that the documented information relevant to the group management system and the conformance with the requirements of		

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
the sustainable forest management standard is:		
a) up to date;	YES	<p>PEFC DK 003-5, 5.3</p> <p>“The group leader must initiate and maintain procedures to control all documents and records required according to this standard so that:</p> <ul style="list-style-type: none"> a) They can be located b) They are reviewed periodically and updated by an employee designated for the purpose, if necessary c) The current version of relevant documents is available in all locations where operations essential to the functioning of the system are performed <p>The documents must be readily legible, dated (with update dates) and easily recognisable. Procedures and responsibilities must be established and maintained, taking into account the creation and amendment of various documents.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
b) available and suitable for use, where and when it is needed;	YES	<p>See above</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
c) adequately protected against loss of confidentiality, improper use, or loss of integrity.	YES	<p>PEFC DK 003-5, 5.5: "The group leader shall initiate and maintain procedures to control all documents and records required according to this standard so that including determining the information to be included in the audit as well as methods of monitoring, measurement and evaluation, where appropriate, to ensure valid results; and when these should be assessed and analyzed so that: (...) d) The storage is done so that they can not be compromised or misused."</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
8. Operation		
8.1 The standard requires that the group organisation shall plan, implement and control processes needed:		
a) to meet the requirements of the group certification standard and the sustainable forest management standard and	YES	<p>PEFC DK 003-5, 5.2</p> <p>"It must be demonstrated that the enterprise has established a management system in accordance with this standard (sections 5.3 – 5.9) and that all group members meet the requirements of PEFC Denmark's Forest Management Standard – PEFC DK 001-4"</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
b) to implement the actions determined in 6.	YES	<p>PEFC DK 003-5, 5.2</p> <p>"It must be demonstrated that the enterprise has established a management system in accordance with this standard (sections 5.3 – 5.9) and that all group members meet the requirements of PEFC Denmark's Forest Management</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>Standard – PEFC DK 001-4”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
8.2 The standard requires that this planning, implementing and controlling shall be done by:		
a) defining the necessary processes and establishing criteria for those;	YES	<p>PEFC DK 003-5, 5.2</p> <p>“PEFC certification of group leaders requires the use of a management system. The system must at least be able to handle and manage the routine and documentation requirements imposed on the group leader in this document.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met</p>
b) implementing control of the processes in accordance with the criteria;	YES	<p>PEFC DK 003-5, 5.2</p> <p>“PEFC certification of group leaders requires the use of a management system. The system must at least be able to handle and manage the routine and documentation requirements imposed on the group leader in this document. “</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
c) keeping documented information to the extent necessary to have confidence that the processes have been carried out as planned.	YES	<p>PEFC DK 003-5, 5.5</p> <p>“The group leader must initiate and maintain procedures to control all</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>documents and records required according to this standard so that:</p> <ul style="list-style-type: none"> a) They can be located b) They are reviewed periodically and updated by an employee designated for the purpose, if necessary c) The current version of relevant documents is available in all locations where operations essential to the functioning of the system are performed <p>The documents must be readily legible, dated (with update dates) and easily recognisable. Procedures and responsibilities must be established and maintained, taking into account the creation and amendment of various documents."</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
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	<p>PEFC DK 003-5, 5,5</p> <p>5.5 Monitoring, measurement, analysis and evaluation</p> <p>The group leader shall initiate and maintain procedures to control all documents and records required according to this standard including determining the information to be included in the audit as well as methods of monitoring, measurement and evaluation, where appropriate, to ensure valid results; and</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>when these should be assessed and analyzed so that:</p> <p>a) They can be located</p> <p>b) They are reviewed periodically and updated by an employee designated for the purpose, if necessary</p> <p>c) The current version of relevant documents is available in all locations where operations essential to the functioning of the system are performed</p> <p>d) The storage is done so that they can not be compromised or misused</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark can be considered as essentially addressed.</p>
b) the methods for monitoring, measurement, analysis and evaluation, as applicable, to ensure valid results;	YES	<p>See 9.1.1a</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark can be considered as essentially addressed.</p>
c) when the monitoring and measuring shall be performed;	YES	<p>PEFC DK 003-5, 5.4</p> <p>6. The group leader must collect information from the group member at appropriate intervals concerning matters relating to the management of the forest. This information must be collected before renewal of the agreement, as a minimum</p> <p>Assessment decision: Conformity</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Justification: The benchmark requirement is met.
d) when the results from monitoring and measurement shall be analysed and evaluated;	YES	See 9.1.1a Assessment decision: Conformity Justification: The benchmark can be considered as essentially addressed.
e) what documented information shall be available as evidence of the results.	YES	See 9.1.1a Assessment decision: Conformity Justification: The benchmark can be considered as essentially addressed.
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 DK 003-5, 5.2: "It shall be demonstrated that the enterprise has established a management system in accordance with this standard (sections 5.3 – 5.9) and that all group members meet the requirements of PEFC Denmark's Forest Management Standard – PEFC DK 001-4. The enterprise is also obliged to go on improving and evaluate the management system based on the results of an ongoing internal monitoring programme and ensuring that the members of the group go on improving their forest management." Assessment decision: Conformity Justification: The benchmark requirement is met.
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:		

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
<p>a) conforms to</p> <p>i. the group organisation's own requirements for its group management system;</p> <p>ii. the requirements of the national group certification standard;</p>	YES	<p>PEFC DK 003-5, 5.6, 5.7</p> <p>"5.6 Internal audit - Of the management system: The group leader must conduct internal audits of their own management system at least once a year, covering all the requirements in these guidelines, as well as implementing corrective and preventive measures if required."</p> <p>"5.7 Management control - The enterprise's management must review compliance with the applicable requirements from PEFC Denmark at least once a year."</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
<p>b) ensures the implementation of the sustainable forest management standard on the participant level;</p>	YES	<p>PEFC DK 003-5, 5.6</p> <p>"Internal audit (...) Of the group members:</p> <p>1) The group leader must conduct internal audits of group members at least once a year to make it likely that the individual group members will meet the requirements of PEFC Denmark's Forest Management Standard – PEFC DK 001-4."</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
<p>c) is effectively implemented and maintained.</p>	YES	<p>PEFC DK 003-5, 5.6, 5.7</p> <p>"5.6 Internal audit - Of the management system: The group leader must conduct internal audits of their own management system at least once a year, covering</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>all the requirements in these guidelines, as well as implementing corrective and preventive measures if required.”</p> <p>“5.7 Management control - The enterprise’s management must review compliance with the applicable requirements from PEFC Denmark at least once a year.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
9.2.1.2 The standard requires that the internal audit programme shall cover the group entity and all group participants. The group entity shall be audited annually. The participants may be selected on a sample basis.	YES	<p>PEFC DK 003-5, 5.6</p> <p>“Internal audit - Of the management system: The group leader must conduct internal audits of their own management system at least once a year (...)</p> <p>Of the group members: The group leader must conduct internal audits of group members at least once a year (...). The internal audit may be based on a sample of group members.</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
9.2.2 Organisation		
The standard requires an internal audit programme which shall cover at least:		
a) planning, establishing, implementing and maintaining an audit programme(s) including the frequency, methods, responsibilities, planning requirements and reporting, which shall take into consideration the importance of the	YES	<p>PEFC DK 003-5, 5.6</p> <p>“Internal audit - Of the management system:</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
processes concerned and the results of previous audits;		<p>The group leader must conduct internal audits of their own management system at least once a year, covering all the requirements in these guidelines, as well as implementing corrective and preventive measures if required.</p> <p>Of the group members:</p> <p>The group leader must conduct internal audits of group members at least once a year to make it likely that the individual group members will meet the requirements of <i>PEFC Denmark's Forest Management Standard – PEFC DK 001-4</i>.</p> <p>The internal audit may be based on a sample of group members. The group leader must establish a sampling strategy so that at least the square root of the number of group members is included in each internal audit. The minimum number of group members included in the internal audit may be changed if this can be verified on the basis of a risk assessment that takes into account defined risks among the members of the group. At least 25% of the sample must be selected at random.</p> <p>The following must be taken into account when planning the internal audits and selecting group members in this context:</p> <ul style="list-style-type: none"> - Results from previous internal and external audits - Comments received - Variation in the size of forest properties - Geographical distribution - Seasonal variations

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<ul style="list-style-type: none"> - Other risk factors - The forest's association with the group in general <p>The reports from the internal audits must be reviewed annually by the senior management at the enterprise.</p> <p>Note: "The forest's association with the group in general" means that if the forest is associated with the group in another way, e.g. if the group leader carries out day-to-day administration of the forest property, this will normally lead to lower intensity in regard to selection for internal audits than if the forest property's only association with the group is its certification.</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
b) definition of the audit criteria and scope for each audit;	YES	<p>PEFC DK 003-5, 5.6</p> <p>"The group leader must conduct internal audits of group members at least once a year to make it likely that the individual group members will meet the requirements of <i>PEFC Denmark's Forest Management Standard – PEFC DK 001-4</i>."</p> <p>Assessment decision: Conformity</p> <p>Justification: PEFC DK 001-4 criteria and the participant's conformity with them can be considered as constituting scope and criteria of the internal audit.</p>
c) competence of internal auditor (forest knowledge, standard knowledge);	YES	<p>PEFC DK 003-5, 5.1</p> <p>"(...) The group leader must ensure that decisions on the inclusion of group</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>members in the group and conducting the internal audit are carried out by a forest management expert with professional expertise in forest management and the environmental impact of forest management and three years of practical experience with Danish forest management.</p> <p>Note: Professional expertise in forest management and the environmental impact of forest management can be documented by staff who have relevant training and professional experience in forest management in relation to forest management. Master of Forestry, Forest and Landscape Engineer, Biologist, Forest technician or similar are all potentially relevant programmes.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met</p>
d) selection of auditors and conducting of audits to ensure objectivity and the impartiality of the audit process;	YES	<p>PEFC DK 003-5, 5.6: “The following shall be taken into account when planning the internal audits and selecting group members in this context: (...) - Internal audit may not be performed by the day-to-day operations manager</p> <p>The reports from the internal audits shall be reviewed annually by the senior management at the enterprise.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is essentially covered.</p>
e) ensuring that the results of the audits are reported to relevant group management;	YES	<p>PEFC DK 003-5, 5.6</p> <p>“(…) The reports from the internal audits must be reviewed annually by the senior management at the enterprise.</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Assessment decision: Conformity Justification: The benchmark requirement is met.
f) retaining of the documented information as evidence of the implementation of the audit programme and the audit results.	YES	PEFC DK 003-5, 5.6 “(…) The following must be taken into account when planning the internal audits and selecting group members in this context: - Results from previous internal and external audits (…)” Assessment decision: Conformity Justification: The benchmark requirement is met.
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:	YES	PEFC DK 003-5, 5.6 “The internal audit may be based on a sample of group members. The group leader must establish a sampling strategy so that at least the square root of the number of group members is included in each internal audit. The minimum number of group members included in the internal audit may be changed if this can be verified on the basis of a risk assessment that takes into account defined risks among the members of the group. At least 25% of the sample must be selected at random.” Assessment decision: Conformity

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Justification: The benchmark requirement is met.
a) determination of the sample size (9.3.2);	YES	<p>PEFC DK 003-5, 5.6</p> <p>“The internal audit may be based on a sample of group members. The group leader must establish a sampling strategy so that at least the square root of the number of group members is included in each internal audit. The minimum number of group members included in the internal audit may be changed if this can be verified on the basis of a risk assessment that takes into account defined risks among the members of the group. At least 25% of the sample must be selected at random.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
b) determination of sample categories (9.3.3);	YES	<p>PEFC DK 003-5, 5.6</p> <p>“(…) The following must be taken into account when planning the internal audits and selecting group members in this context:</p> <ul style="list-style-type: none"> - Results from previous internal and external audits - Comments received - Variation in the size of forest properties - Geographical distribution - Seasonal variations - Other risk factors - The forest’s association with the group in general” <p>Assessment decision: Conformity</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Justification: The benchmark requirement is met.
c) distribution of the sample to the categories (9.3.4);	YES	<p>PEFC DK 003-5, 5.6</p> <p>“(…) The following must be taken into account when planning the internal audits and selecting group members in this context:</p> <ul style="list-style-type: none"> - Results from previous internal and external audits - Comments received - Variation in the size of forest properties - Geographical distribution - Seasonal variations - Other risk factors - The forest’s association with the group in general” <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
d) selection of the participants (9.3.5).		<p>PEFC DK 003-5, 5.6</p> <p>“(…) The following must be taken into account when planning the internal audits and selecting group members in this context:</p> <ul style="list-style-type: none"> - Results from previous internal and external audits - Comments received - Variation in the size of forest properties - Geographical distribution - Seasonal variations - Other risk factors - The forest’s association with the group in general”

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Assessment decision: onformity Justification: The benchmark requirement is
9.3.1.2 The standard may define additional requirements on the regional, national or sub-national level.	YES	PEFC Denmark comment: "Not relevant in the Danish system." Assessment decision: Conformity Justification: The standard does not define additional requirements on the regional, national or sub-national level. As the benchmark is permissive rather than obligating, the benchmark is met.
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.	NO	PEFC Denmark comment: "Participation of pre-existing organisations or group or the members participation is not possible in the danish system." Assessment decision: Minor Nonconformity Justification: The Danish PEFC System does not formally exclude participation of pre-existing organisations or group or the members.
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 DK 003-5, 5.6 "The internal audit may be based on a sample of group members. The group leader must establish a sampling strategy so that at least the square root of the number of group members is included in each internal audit. The minimum number of group members included in the internal audit may be changed if this can be verified on the basis of a risk assessment that takes into account defined risks among the members of the group. At least 25% of the sample must be

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>selected at random.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
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	<p>PEFC DK 003-5, 5.6</p> <p>“The internal audit may be based on a sample of group members. The group leader must establish a sampling strategy so that at least the square root of the number of group members is included in each internal audit. The minimum number of group members included in the internal audit may be changed if this can be verified on the basis of a risk assessment that takes into account defined risks among the members of the group. At least 25% of the sample must be selected at random.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
9.3.2.3 The size of the sample may be adapted by a standard taking into account one or more of the following indicators:		
a) results of a risk assessment. In this case deviations of sample sizes in case of low or high risk for individual categories shall be defined;	YES	<p>PEFC DK 003-5, 5.6: “The internal audit may be based on a sample of group members. The group leader shall establish a sampling strategy so that at least the square root of the number of group members is included in each internal audit. The minimum number of group members included in the internal audit may be changed if this can be verified on the basis of a risk assessment that takes into account defined risks among the members of the group. At least 25% of the sample shall be selected at random. These factors, if relevant, shall reflect the sample size for the possible different samples and the distribution to the categories. The group leader shall define, which factors to be considered in</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>constituting higher or lower risk assesment and shall have a procedure for how the sample for internal audit is taken and how risk is included”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
b) results of internal audits or previous certification audits;	YES	<p>PEFC DK 003-5, 5.6</p> <p>The following must be taken into account when planning the internal audits and selecting group members in this context:</p> <ul style="list-style-type: none"> - Results from previous internal and external audits - (...) <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
c) quality / level of confidence of the internal monitoring programme;	N/A	<p>Assessment decision: N/A</p> <p>Justification: Not used for sampling in the Danish system.</p>
<p>d) use of technologies allowing the gathering of information concerning specified requirements;</p> <p>Note: Such technologies may be e.g. the use of satellite data or drones and allow compliance statements for specific requirements of a sustainability standard or support the risk based sampling.</p>	N/A	<p>Assessment decision: N/A</p> <p>Justification: Not used for sampling in the Danish system.</p>
e) based on other means of gathering information about	YES	PEFC DK 003-5, 5.6

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
<p>activities on the ground.</p> <p>Note: One way could be a survey with participants who provide some information about their activities on the ground.</p>		<p>“The following must be taken into account when planning the internal audits and selecting group members in this context:</p> <ul style="list-style-type: none"> - (...) Comments received - (...) The forest’s association with the group in general” <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
9.3.3 Determination of sample categories		
9.3.3.1 The sample categories shall be established based on the results of a risk assessment. The indicators used in the risk assessment shall reflect the geographical scope of the standard. The following non exhaustive list of indicators may be used for the risk assessment:		
a) ownership type (e.g. state forest, communal forest, private forest);	N/A	<p>Assessment decision: N/A</p> <p>Justification: Not used for sampling in the Danish system.</p>
b) size of management units (different size classes);	YES	<p>PEFC DK 003-5, 5.6</p> <p>“(…) The minimum number of group members included in the internal audit may be changed if this can be verified on the basis of a risk assessment that takes into account defined risks among the members of the group.</p> <p>The following must be taken into account when planning the internal audits and selecting group members in this context:</p> <ul style="list-style-type: none"> - Results from previous internal and external audits - Comments received - Variation in the size of forest properties - Geographical distribution

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<ul style="list-style-type: none"> - Seasonal variations - Other risk factors - The forest's association with the group in general <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
c) biogeographic region (e.g. lowlands, low mountain range, high mountain range);	YES	<p>See above</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
d) operations, processes and products of potential group participants;	N/A	<p>Assessment decision: N/A</p> <p>Justification: Not used for sampling in the Danish system.</p>
e) deforestation and forest conversion;	N/A	<p>Assessment decision: N/A</p> <p>Justification: Not used for sampling in the Danish system.</p>
f) rotation period(s);	N/A	<p>Assessment decision: N/A</p> <p>Justification: Not used for sampling in the Danish system.</p>
g) richness of biological diversity;	N/A	<p>Assessment decision: N/A</p> <p>Justification: Not used for sampling in the Danish system.</p>
h) recreation and other socio-economic functions of the	N/A	<p>Assessment decision: N/A</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
forest;		Justification: Not used for sampling in the Danish system.
i) dependence of and interaction with local communities and indigenous people;	N/A	Assessment decision: N/A Justification: Not used for sampling in the Danish system.
j) available resources for administration, operations, training and research;	N/A	Assessment decision: N/A Justification: Not used for sampling in the Danish system.
k) governance and law enforcement.	N/A	Assessment decision: N/A Justification: Not used for sampling in the Danish system.
9.3.3.2 Conditions which constitute risk for each indicator on low, medium and high level and the respective consequences for the sampling shall be defined.	YES	PEFC DK 003-5, 5.6: "The internal audit may be based on a sample of group members. The group leader shall establish a sampling strategy so that at least the square root of the number of group members is included in each internal audit. The minimum number of group members included in the internal audit may be changed if this can be verified on the basis of a risk assessment that takes into account defined risks among the members of the group. At least 25% of the sample shall be selected at random. These factors, if relevant, shall reflect the sample size for the possible different samples and the distribution to the categories. The group leader shall define, which factors to be considered in constituting higher or lower risk assessment and shall have a procedure for how the sample for internal audit is taken and how risk is included" Assessment decision: Conformity Justification: The benchmark requirement is met.
9.3.4 Distribution of the sample	YES	PEFC DK 003-5, 5.6: "The internal audit may be based on a sample of group members. The group leader shall establish a sampling strategy so that at least

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
The sample shall be distributed to the categories according to the result of the risk assessment.		<p>the square root of the number of group members is included in each internal audit. The minimum number of group members included in the internal audit may be changed if this can be verified on the basis of a risk assessment that takes into account defined risks among the members of the group. At least 25% of the sample shall be selected at random. These factors, if relevant, shall reflect the sample size for the possible different samples and the distribution to the categories. The group leader shall define, which factors to be considered in constituting higher or lower risk assessment and shall have a procedure for how the sample for internal audit is taken and how risk is included"</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
9.3.5 Selection of the participants		
9.3.5.1 At least 25% of the sample should be selected at random.	YES	<p>PEFC DK 003-5, 5.6</p> <p>"(...) At least 25% of the sample must be selected at random."</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
9.3.5.2 A risk-based procedure for the selection of the participants shall be specified.	YES	<p>PEFC DK 003-5, 5.6</p> <p>"(...) These factors, if relevant, shall reflect the sample size for the possible different samples and the distribution to the categories. The group leader shall define, which factors to be considered in constituting higher or lower risk assessment and shall have a procedure for how the sample for internal audit is taken and how risk is included"</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Assessment decision: Conformity Justification: The benchmark requirement is met.
9.4 Management review		
9.4.1 The standard requires that an annual management review shall at least include:		
a) the status of actions from previous management reviews;	YES	<p>PEFC DK 003-5, 5.6, 5.3</p> <p>“Internal audit - Of the management system:</p> <p>The group leader must conduct internal audits of their own management system at least once a year, covering all the requirements in these guidelines, as well as implementing corrective and preventive measures if required.”</p> <p>“5.7 Management control</p> <p>The enterprise’s management must review compliance with the applicable requirements from PEFC Denmark at least once a year.”</p> <p>“5.3 (...) 7. Based on the results of the internal and external audits, to initiate corrective and preventive measures in the event of identified non-conformances in the associated forests <u>and the group leader’s administrative system. The effectiveness of corrective and preventive measures is subsequently evaluated.</u>”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark can be considered as essentially addressed.</p>
b) changes in external and internal issues that are relevant	YES	<p>PEFC DK 003-5, 5,6: “The group leader shall conduct internal audits of their own management system at least once a year, covering all the requirements in these</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
to the group management system;		<p>guidelines, as well as implementing corrective and preventive measures if required. The management review shall at least include:</p> <ul style="list-style-type: none"> • Changes in external and internal issues • Trends in nonconformities and corrective actions • Audit results" <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
c) the status of conformity with the sustainable forest management standard, that includes reviewing the results of the internal monitoring programme, the internal audit and the certification body's evaluations and surveillance;	YES	<p>PEFC DK 003-5, 5.6, 5.3</p> <p>"Internal audit - Of the management system:</p> <p>The group leader must conduct internal audits of their own management system at least once a year, covering all the requirements in these guidelines, as well as implementing corrective and preventive measures if required."</p> <p>"5.7 Management control</p> <p>The enterprise's management must review compliance with the applicable requirements from PEFC Denmark at least once a year."</p> <p>"5.3 (...) 7. Based on the results of the internal and external audits, to initiate corrective and preventive measures in the event of identified non-conformances in the associated forests and the group leader's administrative system. <u>The effectiveness of corrective and preventive measures is subsequently evaluated.</u>"</p> <p>Assessment decision: Conformity</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Justification: The benchmark can be considered as met.
<p>d) information on the group performance, including trends in:</p> <p>i. nonconformities and corrective actions;</p> <p>ii. monitoring and measurement results;</p> <p>iii. audit results;</p>	YES	<p>PEFC DK 003-5, 5,6: “The group leader shall conduct internal audits of their own management system at least once a year, covering all the requirements in these guidelines, as well as implementing corrective and preventive measures if required. The management review shall at least include:</p> <ul style="list-style-type: none"> • Changes in external and internal issues • Trends in nonconformities and corrective actions • Audit results” <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
<p>e) opportunities for continual improvement.</p>	YES	<p>PEFC DK 003-5, 5.2, 5.3</p> <p>“5.2: The enterprise is also obliged to go on improving the management system and ensuring that the members of the group go on improving their forest management.”</p> <p>“5.3 (...) 7. Based on the results of the internal and external audits, to initiate corrective and preventive measures in the event of identified non-conformances in the associated forests <u>and the group leader’s administrative system. The effectiveness of corrective and preventive measures is subsequently evaluated.</u>”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark can be considered as essentially addressed.</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
9.4.2 The standard requires that the outputs of the management review shall include decisions related to continual improvement opportunities and any need for changes to the group management system.	YES	<p>PEFC DK 003-5, 5.2, 5.3</p> <p>“5.2: The enterprise is also obliged to go on improving the management system and ensuring that the members of the group go on improving their forest management.”</p> <p>“5.3 (...) 7. Based on the results of the internal and external audits, to initiate corrective and preventive measures in the event of identified non-conformances in the associated forests <u>and the group leader’s administrative system. The effectiveness of corrective and preventive measures is subsequently evaluated.</u>”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark can be considered as essentially addressed.</p>
9.4.3 The standard requires that the group organisation shall retain documented information as evidence of the results of management reviews.	YES	<p>PEFC DK 003-5, 5.5: “The group leader shall initiate and maintain procedures to control all documents and records required according to this standard including determining the information to be included in the audit as well as methods of monitoring, measurement and evaluation, where appropriate, to ensure valid results; and when these should be assessed and analyzed so that: (...)”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark can be considered as met.</p>
10. Improvement		
10.1 Nonconformity and corrective action		
10.1.1 The standard requires when a nonconformity occurs, the group organisation shall:		

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
<p>a) react to the nonconformity and, as applicable:</p> <p>i. take action to control and correct it;</p> <p>ii. deal with the consequences;</p>	YES	<p>PEFC DK 003-5 5.3</p> <p>“Group leaders organise and manage group certification of forest properties and must perform the following functions in that respect: (...) 7. Based on the results of the internal and external audits, to initiate corrective and preventive measures in the event of identified non-conformances in the associated forests and the group leader’s administrative system. The effectiveness of corrective and preventive measures is subsequently evaluated.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark can be considered as essentially addressed.</p>
<p>b) evaluate the need for action to eliminate the causes of the nonconformity, in order that it does not recur or occur elsewhere, by:</p> <p>i. reviewing the nonconformity;</p> <p>ii. determining the causes of the nonconformity;</p> <p>iii. determining if similar nonconformities exist, or could potentially occur;</p>	YES	<p>PEFC DK 003-5 5.3</p> <p>“Group leaders organise and manage group certification of forest properties and must perform the following functions in that respect: (...)7. Based on the results of the internal and external audits, analyze non-conformance in order to determine possible causes and to initiate corrective and preventive measures in the event of identified non-conformances in the associated forests and the group leader’s administrative system. The analyseis and effectiveness of corrective and preventive measures is subsequently evaluated and retained”</p> <p>PEFC DK 003-5 Appendix 1, 2. Minor non-conformance</p> <p>“(...) Whether the non-conformance is reasonably justified by special circumstances at the property is assessed. Non-conformances shall be indicated in the audit report.</p> <p>If the non-conformance cannot be justified as stated, this is pointed out to the</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>owner in writing and the owner is ordered in writing to implement a corrective measure. Depending on the nature of the non-conformance, the group leader may define a time limit for the corrective measure, which may be at the time of the next follow-up audit at the latest – but within no more than one year. (...)”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is sufficiently addressed.</p>
c) implement any action needed;	Yes	<p>PEFC DK 003-5, 5.6</p> <p>“Internal audit - Of the management system:</p> <p>The group leader must conduct internal audits of their own management system at least once a year, covering all the requirements in these guidelines, as well as implementing corrective and preventive measures if required.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
d) review the effectiveness of any corrective action taken;	YES	<p>PEFC DK 003-5 5.3</p> <p>“Group leaders organise and manage group certification of forest properties and must perform the following functions in that respect: (...) 7. Based on the results of the internal and external audits, to initiate corrective and preventive measures in the event of identified non-conformances in the associated forests and the group leader’s administrative system. The effectiveness of corrective and preventive measures is subsequently evaluated.”</p> <p>Assessment decision: Conformity</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Justification: The benchmark requirement is met.
e) make changes to the group management system, if necessary.	YES	<p>PEFC DK 003-5 5.3</p> <p>“Group leaders organise and manage group certification of forest properties and must perform the following functions in that respect: (...) 7. Based on the results of the internal and external audits, to initiate corrective and preventive measures in the event of identified non-conformances in the associated forests and the group leader’s administrative system. The effectiveness of corrective and preventive measures is subsequently evaluated.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark can be considered as essentially addressed.</p>
10.1.2 The standard requires that the group organisation shall retain documented information as evidence of:		
a) the nature of the nonconformities and any subsequent actions taken;	YES	<p>PEFC DK 003-5, 5.3: “(...) 7. Based on the results of the internal and external audits, analyse non-conformities to determine nature and to initiate corrective and preventive measures in the event of identified non-conformances in the associated forests and the group leader’s administrative system. The analysis and effectiveness of corrective and preventive measures is subsequently evaluated and retained”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark is met.</p>
b) the results of any corrective action.	YES	<p>PEFC DK 003-5, 5.3: “(...) 7. Based on the results of the internal and external audits, analyse non-conformities to determine nature and to initiate corrective and preventive measures in the event of identified non-conformances in the</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>associated forests and the group leader's administrative system. The analysis and effectiveness of corrective and preventive measures is subsequently evaluated and retained"</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark is met.</p>
10.1.3 The standard requires that a participant who was excluded from a group certification shall be internally audited by the group entity before it is allowed to re-enter the group certification. The internal audit shall not take place sooner than 12 months after the exclusion.	YES	<p>PEFC DK 003-5, Annex 1: "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."</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark is met.</p>
<p>10.2 Continual improvement</p> <p>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.</p>	YES	<p>PEFC DK 003-5, 5.2</p> <p>"(...) It must be demonstrated that the enterprise has established a management system in accordance with this standard (sections 5.3 – 5.9) and that all group members meet the requirements of PEFC Denmark's Forest Management Standard – PEFC DK 001-4. The enterprise is also obliged to go on improving the management system and ensuring that the members of the group go on improving their forest management."</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark can be considered as essentially addressed.</p>

PEFC Checklist - Certification and Accreditation Procedures (Annex 6, PEFC TD)

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 DK 000-1, 7.2: "PEFC is based on independent accreditation of certification bodies. It is therefore a mandatory requirement that all certifications performed pursuant to the Danish scheme should be performed by independent, PEFC-notified certification bodies accredited for the purpose. The Danish Accreditation and Metrology Fund, (DANAK) or a similarly recognised accreditation body that is a member of the European co-operation for Accreditation (EA) and/or the International Accreditation Forum (IAF) and has signed the European co-operation for Accreditation's multilateral agreement on mutual recognition of accreditation bodies, MLA Multilateral Agreement (MLA) may perform accreditation."</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
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	<p>PEFC DK 005-4 , 6.3: "The requirements for certification bodies performing certification audits of sustainable forest management and group certification of sustainable forest management are based on Conformity assessment – Requirements for bodies providing audit and certification of management systems (DS/EN ISO/IEC 17021-3:2018) supplemented with specified requirements from PEFC Denmark and expertise in the sector.</p>

No.	PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
			<p>The certification body must:</p> <p>1. Meet, as appropriate, the general criteria defined in Conformity assessment – Requirements for bodies providing audit and certification of management systems (DS/EN ISO/IEC 17021-3:2018) as well as supplementary requirements on this defined in this standard (...)"</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
3.	Does the scheme documentation require that certification bodies carrying out forest certification shall have the technical competence in forest management on its economic, social and environmental impacts, and on the forest certification criteria?	Annex 6, 3.1	<p>Yes</p> <p>PEFC DK 005-4, 6.3: "The certification body must: (...) 4. Have technical expertise in forest management which covers economic, social and environmental impact on forest management"</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
4.	Does the scheme documentation require that certification bodies shall have a good understanding of the national PEFC system against which they carry out forest management certification?	Annex 6, 3.1	<p>Yes</p> <p>PEFC DK 005-4, 6.3: "The certification body must: (...) 3. Have a good knowledge of the Danish PEFC certification scheme as regards sustainable forest management (...)"</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met</p>

No.	PEFC benchmark requirement		YES / NO	Reference to system documentation (including quotation of relevant text)
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	<p>PEFC DK 005-4, 5.1: "Auditing must involve at least one forest management expert with professional expertise in forest management and the environmental impact of forest management, and with at least three years of practical experience of Danish forest management. The three-year period can be reduced to two years if the auditor has participated in four audits together with a qualified auditor. Furthermore, audits must include at least one person with experience of certification procedures. This may be one and the same person. Gender equality should be given priority when recruiting and training auditors.</p> <p>NOTE: Professional expertise in forest management and the environmental impact of forest management can be documented by staff who have relevant training and professional experience in forest management in relation to forest management. Master of Forestry, Forest and Landscape Engineer, Biologist, Forest technician or similar are all potentially relevant programmes."</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
6.	Does the scheme documentation require that the auditors must fulfil the general criteria of ISO 19011 for Quality Management Systems auditors or for Environmental Management Systems auditors?	Annex 6, 3.2	Yes	<p>PEFC DK 005-4, 5.1: (...) The auditor must (...) 2. Meet the general requirements for auditors defined in <i>Guidelines for auditing management systems (DS/EN ISO 19011:2018)</i>"</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
7.	Does the scheme documentation include additional qualification requirements for	Annex 6,	Yes	PEFC DK 005-4, 5.1: "Auditing must involve at least one forest management expert with professional expertise in forest management

No.	PEFC benchmark requirement		YES / NO	Reference to system documentation (including quotation of relevant text)
	auditors carrying out forest management audits? ^[*1]	3.2		<p>and the environmental impact of forest management, and with at least three years of practical experience of Danish forest management. The three-year period can be reduced to two years if the auditor has participated in four audits together with a qualified auditor. Furthermore, audits must include at least one person with experience of certification procedures. This may be one and the same person. Gender equality should be given priority when recruiting and training auditors.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
Certification procedures				
8.	Does the scheme documentation require that certification bodies shall have established internal procedures for forest management certification?	Annex 6, 4	Yes	<p>PEFC DK 005-4, 6.5: “Certification and auditing procedure for certification of sustainable forest management, including group certification</p> <p>The certification body must establish internal procedures for the certification and auditing of sustainable forest management, including group certification of sustainable forest management pursuant to the Danish scheme.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
9.	Does the scheme documentation require that applied certification procedures for forest management certification shall fulfil or be compatible with the requirements defined in ISO 17021?	Annex 6, 4	Yes	<p>PEFC DK 005-4, 6.4.5: “Supplementary for the certification process - The certification procedures described in section 6.5 meet the requirements in Conformity assessment – Requirements for bodies providing audit and certification of management systems (DS/EN ISO/IEC 17021-3:2018) (...)”</p>

No.	PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
			Assessment decision: Conformity Justification: The benchmark requirement is met.
10.	Does the scheme documentation require that applied auditing procedures shall fulfil or be compatible with the requirements of ISO 19011?	Annex 6, 4 NO	Assessment decision: onformity Justification: The benchmark requirement is
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 DK 005-4, 6.4.1: "Registrations and information - The certification body must notify PEFC Denmark of all certificates issued pursuant to the Danish PEFC scheme and amendments to the validity and scope of these certificates. In this context, the certification body must maintain and update a register of the forest properties and group leaders that are certified by them pursuant to the Danish scheme." Assessment decision: Conformity Justification: The benchmark requirement is met
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 DK 005-4, 2: "This standard must be applied in accordance with the Danish PEFC system, covering: (...) Use of PEFC trademarks in accordance with international standard <i>PEFC Trademarks Rules – Requirements – PEFC ST 2001:2020</i> " Assessment decision: Conformity Justification: The benchmark requirement is met.
13.	Does a maximum period for surveillance audits defined by the scheme documentation	Annex 6, 4 YES	PEFC DK 005-4, 6.5.7: "6.5.7 The certification body must perform annual follow-up audits at

No.	PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
	not exceed more than one year?		<p>certified forest properties and group leaders during the period of validity of the certificate so as to verify that they continue to meet the requirements of the Danish scheme.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
14.	Does a maximum period for assessment audit not exceed five years for forest management certifications?	Annex 6, 4	<p>YES</p> <p>PEFC DK 005-4, 6.4.2, 6.3:</p> <p>“6.4.2 Period of validity - A certificate may be valid for no more than five years.”</p> <p>“6.3 (...) The certification body must: 1. Meet, as appropriate, the general criteria defined in Conformity assessment – Requirements for bodies providing audit and certification of management systems (DS/EN ISO/IEC 17021-3:2018) as well as supplementary requirements on this defined in this standard (...)”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met</p>
15.	Does the scheme documentation include requirements for public availability of certification report summaries?	Annex 6, 4	<p>Yes</p> <p>PEFC DK 005-4, 6.5.4: “The certification body must make the summary of the certification report available to the general public.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
16.	Does the scheme documentation include requirements for usage of information from	Annex 6, 4	<p>Yes</p> <p>PEFC DK 005-4, 6.5.3: “Certification audit – main audit - The certification audit must include the following phases: 1. Public consultation. Before</p>

No.	PEFC benchmark requirement		YES / NO	Reference to system documentation (including quotation of relevant text)
	external parties as the audit evidence?			<p>assessing compliance with PEFC Denmark's Forest Management Standard – PEFC DK 001-4, relevant stakeholders must be consulted with a time limit of at least 14 days. As a minimum, the consultation must be undertaken by means of an announcement on the certification body's website. Relevant information from external parties must then be included in the assessment"</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
17.	Does the scheme documentation include additional requirements for certification procedures? ^[*1]	Annex 6, 4	Yes	<p>PEFC DK 005-4, 6.4: "PEFC Denmark's supplementary requirements for certification bodies performing certification of sustainable forest management and group certification of sustainable forest management pursuant to the Danish scheme in relation to <i>Conformity assessment – Requirements for bodies providing audit and certification of management systems (DS/EN ISO/IEC 17021-3:2018)</i> are specified below."</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
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 DK 005-4, 6.1: "Accreditation - Certification bodies that perform certification of sustainable forest management and/or group certification of sustainable forest management must be accredited for this purpose. The Danish Accreditation and Metrology Fund, DANAK or a similarly recognised accreditation body that has signed the multilateral agreement on mutual recognition of accreditation bodies developed by the European co-operation for Accreditation (EA) and is a member of the</p>

No.	PEFC benchmark requirement		YES / NO	Reference to system documentation (including quotation of relevant text)
				<p>International Accreditation Forum (IAF) may be in charge of accreditation.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</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 DK 005-4, 6.6: “Information on certificates - Certificates must as a minimum include information regarding: (...)</p> <ul style="list-style-type: none"> - Name and accreditation number of the certification body - The relevant accreditation body symbol” <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</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 Forum (IAF) umbrella or a member of IAF’s special recognition regional groups and which implement procedures described in ISO 17011 and other documents recognised by the above mentioned organisations?	Annex 6, 5	Yes	<p>PEFC DK 005-4, 7: “Requirements for accreditation bodies - The accreditation body must be a member of the European Cooperation for Accreditation (EA) and/or the International Accreditation Forum (IAF) and must have signed the multilateral agreement on mutual recognition of accreditation bodies.”</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
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	Annex 6, 5	Yes	<p>PEFC DK 005-4, 6.5: “Certification and auditing procedure for certification of sustainable forest management, including group certification</p> <p>The certification body must establish internal procedures for the certification and auditing of sustainable forest management, including</p>

No.	PEFC benchmark requirement		YES / NO	Reference to system documentation (including quotation of relevant text)
	be covered by the accreditation scope?			<p>group certification of sustainable forest management pursuant to the Danish scheme.</p> <p>This procedure must meet the requirements in Conformity assessment – Requirements for bodies providing audit and certification of management systems (DS/EN ISO/IEC 17021-3:2018)."</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
22.	Does the scheme documentation include a mechanism for PEFC notification of certification bodies?	Annex 6, 6	Yes	<p>PEFC DK 005-4, 6.2: "PEFC notification - Certification bodies that perform certification of sustainable forest management and/or group certification of sustainable forest management pursuant to the Danish scheme must be PEFC-notified by PEFC Denmark in accordance with Guidance on notification of certification bodies – PEFC DK 006-4"</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>
23.	Are the procedures for PEFC notification of certification bodies non-discriminatory?	Annex 6, 6	Yes	<p>PEFC DK 006-4, 3: "Conditions for PEFC notification - The certification body applying for PEFC notification from PEFC Denmark must:</p> <ul style="list-style-type: none"> - Be a legal entity - Agree to be listed on the PEFC Council's Internet-based database, which is accessible to the general public, with identification data and/or data specified in PEFC Information and Registration System – Data Requirements – PEFC DG 1008:2019 - Hold valid accreditation issued by a national accreditation body that is a member of the European Cooperation for Accreditation (EA) and/or the

No.	PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
			<p>International Accreditation Forum (IAF) and has signed the multilateral agreement on mutual recognition of accreditation bodies. For forest certification, the accreditation must be issued in accordance with ISO 17065:2012 (Requirements for bodies certifying products, processes and services) and supplementary requirements defined by PEFC Denmark in Requirements for certification and accreditation procedures – PEFC DK 005-4; and for chain of custody to be issued according to ISO 17065:2012 (Requirements for bodies certifying products, processes and services) and supplementary requirements defined by PEFC International in Requirements for Certification Bodies Operating Certification against the PEFC International Chain of Custody Standard – PEFC ST 2003:2020.</p> <p>- The scope of accreditation must include PEFC Denmark's Forest Management Standard – PEFC DK 001-4 and/or PEFC Denmark's requirements for group certification of sustainable forest management – PEFC DK 003-5 and/or, for chain of custody verification, PEFC ST 2002:2020 – Chain of Custody of Forest and Tree Based Products – Requirements”</p> <p>- Sign a PEFC notification contract with PEFC Denmark (Annex 1: PEFC notification contract)”</p> <p>Assessment decision: Conformity</p> <p>Justification: The procedures for PEFC notification of certification bodies can be considered to be non-discriminatory.</p>

Annex B: Results of stakeholder involvement survey

On 10th September 2021 CK Services sent an email to 61 stakeholders from the stakeholder list provided by PEFC Denmark as part of the submitted documentation, inviting them to participate in a stakeholder survey consisting out of eight questions regarding stakeholders' involvement in the standard setting process by email.

These 61 stakeholders had been identified by PEFC Denmark during a stakeholder mapping exercise carried out at the beginning of the revision process.

The stakeholders were invited to respond to the survey via "SurveyMonkey.com", an online survey tool, by 23rd September 2021.

Three survey responses were received. Two of the respondents predominantly confirmed the information provided by PEFC Denmark on the revision process. One stakeholder, who decided to respond to the survey anonymously and could therefore not be contacted by CK Services, denied to have received any information on and invitation to the revision process.

The questions, possible answers that respondents could choose from and given answers are shown in the table below.

Table 19, Stakeholder involvement survey

Question 1: Before you answer the survey, please provide your name and email address in the field below, so that you can be contacted in case of questions. Your name and contact details will not be made publicly available, used for any other purpose or forwarded to third parties.	
Q2: Are you aware of a public announcement by PEFC Denmark at the start of the revision of the Danish Forest Certification System, inviting stakeholders to participate in the revision process? If your answer is "yes", how/where was the announcement made?	
Possible answers:	Answered:
1. Yes, on the website of PEFC Denmark or another website	1. 1x
2. Yes, by press release	2. 1x
3. Yes, in a public magazine or through other media	3. 1x
4. Yes, by direct mailing	4. 2x
5. No	5. 1x
Q3: Did you have access to the standard setting procedures/ rules for the development of the Danish PEFC forest management standard?)	
Possible answers:	Answered:
1. Yes	1. 2x
2. No	2. 1x
3. Don't know	3. 0x

Q4: Have you been invited to nominate a representative to PEFC Denmark's working group for the revision of the Danish Forest Certification System? If your answer is "yes", how/where was the invitation made?	
Possible answers: 1. Yes, by general invitation on PEFC Denmark's website or in other media 2. Yes, directly by mailing or other communication 3. No	Answered: 1. 0x 2. 1x 3. 2x
Q5: Did you submit a nomination to PEFC Denmark, and if you did, has it been accepted or rejected?	
Possible answers: 1. No, we/I did not submit a nomination 2. Yes, we/I submitted a nomination, and it was accepted 3. Yes, we/I submitted a nomination, and it was not accepted	Answered: 1. 2x 2. 1x 3. 0x
Q6: Did you notice the public consultation on a draft revised forest management standard of the Danish Forest Certification System? If yes, where/how?	
Possible answers: 1. Yes, on PEFC Denmark's or other website 2. Yes, through a press release/news article 3. Yes, directly by mailing or other communication 4. No	Answered: 1. 1x 2. 0x 3. 2x 4. 1x
Q7: Have you made comments during the public consultation and if you did, have they been considered?	
Possible answers: 1. No, we/I did not submit comments 2. Yes, we/I submitted comments and they were considered 3. Yes, we/I submitted comments and they were not considered 4. Yes, we/I submitted comments and we/I do not know if they were considered or not	Answered: 1. 2x 2. 1x 3. 0x 4. 0x
Q8: Have you submitted any complaint relating to the standard setting/revision process? If you did submit a complaint, please provide more information in the comment field.	
Possible answers: 1. No 2. Yes	Answered: 1. 3x 2. 0x

Annex C: Results of international consultation

No comments were submitted in the international public consultation on the revised Danish Forest Certification System.

Annex D: Internal review comments

PEFC International Internal Review comments and responses by the assessor:

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6.5 Assessment result – Nonconformities	<p>For details on the minor nonconformity with PEFC ST 1001:2017, 6.3.1e) identified in the revision process, see the table below. (...)</p> <p>PEFC Denmark comment: "See: https://www.pefc.dk/nyheder/offentlig-horing-af-pefc-danmarks-system</p> <p>See box, where it is described how to submit and a instruction document was made if any stakeholders would like to use it: (...)"</p>	Please revisit the content of the checklist for 6.3.1, because d) is still marked as NC. Is this still relevant?	Done. Yes. Evidence provided by PEFC Denmark in the commenting period was not deemed sufficient to resolve the nonconformity identified in the draft report. As stated in the justification for the assessment decision "the evidence provided by PEFC Denmark after the commenting period refers to the announcement of the public consultation on the enquiry drafts of revised system documentation at the end of the revision process, not the invitation to participate in the revision process at the start of the revision process, as required."
7.2 Assessment result – Nonconformities, Table 9, Minor nonconformity with PEFC ST 1003:2018, 8.1.6a)-h)	Comment by PEFC Denmark: "Conversion of severely degraded forests to forest plantations is not possible by the Forestry Act."	I would suggest to PEFC Denmark to include "degraded forest" in the list of T&D, which then could refer to the Danish legislation	Comment added: The definition of the term "degraded forest" in the standard referring to relevant legislation may be worth considering.
PEFC Checklist - Standard Setting Procedures and Process (PEFC ST 1001:2017), 6.3.1d, Procedures	Assessment decision: Minor nonconformity	Check	Editorial mistake: Assessment decision corrected to "Conformity".
PEFC Checklist - Standard Setting Procedures and Process (PEFC ST 1001:2017), 6.4.5a, Process	Assessment decision: N/A Justification: The benchmark requirement is not applicable.	The assessment decision is applicable, the evidence delivers conformity in out view	Changed to: Assessment decision: Conformity Justification: The benchmark requirement is met.
PEFC Checklist - Standard Setting Procedures and Process (PEFC ST 1001:2017), 8.5.4, Process	PEFC Denmark comment: Not relevant – no review made. PEFC Denmark board will change PEFC DK 008-03, when a	When the decision was taken to revise the standard, it was surely decided that editorial revision wouldn't be sufficient.	Changed to: Assessment decision: Conformity Justification: PEFC Denmark made the

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<p>Where the decision is to revise the standard , the standardising body shall specify the type of revision (normal or editorial revision).</p>	<p>review is relevant</p> <p>Assessment decision: N/A</p> <p>Justification: As a revision of the standard took place, the benchmark requirement concerning determining whether a review should be editorial or "normal" can be considered as not applicable.</p>	<p>Therefore, we suggest to revisit this decision and make it applicable, in our view it would be a conformity, if evidence is available that it was decided to carry out a normal revision.</p>	<p>decision to carry out a normal revision.</p>
<p>PEFC Checklist - Sustainable Forest Management (PEFC ST 1003:2018), 4.1 General</p> <p>The requirements for sustainable forest management defined by regional, national or sub-national forest management standards shall: (...) e) specify "100% PEFC certified", or another system specific claim, as claim to be used to communicate the origin of products in an area covered by the standard to customers with a PEFC chain of custody;</p> <p>Note: System specific claims of PEFC endorsed standards and PEFC Council approved abbreviations of such claims and the claim "100% PEFC certified", and their translations into languages other than English, are published online on the PEFC website</p>	<p>PEFC DK 001-4, 5.7: "If products from the forest are sold as certified, the following information as a minimum must be provided by invoice, delivery note or log tally for each delivery: (...) Certificate number, any PEFC trademark and a "100% PEFC-certified" declaration or other relevant statement"</p> <p>Assessment decision: Conformity</p> <p>Justification: The benchmark requirement is met.</p>	<p>Looking at the SFM standard, I think "100% PEFC certified" is not specified and there are missing specifications, which have high impact on this specification. For example see 1.5 in the Danish SFM standard. This paragraph allow the intensive management systems to be applied up to 15% of the area and there's open room for interpretation: The products from the intensively managed areas cannot be sold as PEFC-certified unless specified otherwise</p> <p>Please revisit the assessment decision</p>	<p>Changed to:</p> <p>Assessment decision: Minor nonconformity</p> <p>Justification: The SFM standard of PEFC Denmark specifies that the claim "100% PEFC certified" is used to communicate the origin of products in an area covered by the standard.</p> <p>However, it is not clear what is referred to with "or other relevant statement".</p> <p>Furthermore, PEFC DK 001-4, 1.5 states that "The products from the intensively managed areas cannot be sold as PEFC-certified unless specified otherwise." It is unclear what "unless specified otherwise" entails.</p> <p>Therefore, there is a risk that undetermined claims other than "100% PEFC certified" are used and that material which does not qualify for a PEFC claim is covered by a PEFC claim. Hence, the benchmark requirement</p>

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www.pefc.org.			cannot be considered as sufficiently addressed yet.
PEFC Checklist - Sustainable Forest Management (PEFC ST 1003:2018), 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.	Assessment decision: N/A Justification: The Danish Criminal Code governs bribery and corruption.	Should be referenced in the list of legislation and it can be seen as conformity.	Changed to: Assessment decision: Conformity Justification: The Danish Criminal Code governs bribery and corruption. Comment: The relevant elements of the Danish Criminal Code addressing corruption should be referenced in Annex 1 of DK 001-4.
PEFC Checklist - Sustainable Forest Management (PEFC ST 1003:2018), 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.	PEFC Denmark comment: "Not relevant- No or low risk of illegal activities." Assessment decision: N/A Justification: The fact that the standard does not cover measures against unauthorised activities can be considered as acceptable, taking into account that Denmark has a very low crime rate. (worldpopulationreview.com, "Some of the world's lowest crime rates are seen in Switzerland, Denmark, Norway, Japan, and New Zealand.")	Probably the low crime rate is the outcome of the implemented measures, therefore protecting the certified forest stands from illegal activities are surely covered with relevant legislation. Should be referenced in the list of legislation and it can be seen as conformity.	Changed to: Assessment decision: Conformity Justification: The fact that the standard does not cover measures against unauthorised activities can be considered as acceptable, taking into account that Denmark has a very low crime rate. (worldpopulationreview.com, "Some of the world's lowest crime rates are seen in Switzerland, Denmark, Norway, Japan, and New Zealand." Comment: Relevant elements of Danish legislation addressing illegal activities concerning forests, in particular to illegal logging, illegal land use and illegally initiated fires, should be referenced in Annex 1 of DK 001-4.
PEFC Checklist - Group Forest Management Certification (PEFC ST 1002:2018), 4.1 Understanding the group organisation and its context	Assessment decision: N/A Justification: Group certification is not implemented as regional certification.	It's not clear, why it is not applicable. The group certification doesn't limit this, therefore it seems probable and as conformity.	Changed to: Assessment decision: Conformity Justification: Group certification is not implemented as regional certification in

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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			Denmark. The benchmark requirement is met.
PEFC Checklist - Group Forest Management Certification (PEFC ST 1002:2018), 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: c) whether there are any other specific circumstances which influence the implementation of the group management system.	Assessment decision: N/A Justification: No specific circumstances are defined.	The 9 points above can be seen to deliver conformity	Changed to: Assessment decision: Conformity Justification: No specific circumstances are defined. The benchmark requirement is met.
PEFC Checklist - Group Forest Management Certification (PEFC ST 1002:2018), 4.3.3 The standard shall define which requirements of the sustainable forest management standard may be fulfilled on group level.	Assessment decision: N/A Justification: The standard does not define which requirements of the sustainable forest management standard may be fulfilled on group level. Therefore all requirements of PEFC DK 001-4 apply at the level of the group participant.	It is required to have an assessment decision for this. See chapter 5.2 in DK 003-5 It shall be demonstrated that the enterprise has established a management system in accordance with this standard (sections 5.3 – 5.9)	Wording changed to: DK 003-5, chapter 5.2: “It shall be demonstrated that the enterprise has established a management system in accordance with this standard (sections 5.3 – 5.9) and that all group members meet the requirements of PEFC Denmark’s Forest

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		<p>and that all group members meet the requirements of PEFC Denmark's Forest Management Standard – PEFC DK 001-4.</p> <p>Please include the assessment decision and update the justification.</p>	<p>Management Standard – PEFC DK 001-4.”</p> <p>Assessment decision: Conformity Justification: The standard does not define which requirements of the sustainable forest management standard may be fulfilled on group level. DK 003-5 requires that all requirements of PEFC DK 001-4 are met at the level of the group participant. The benchmark requirement is met.</p>
PEFC Checklist - Group Forest Management Certification (PEFC ST 1002:2018), 9.3.1.2 The standard may define additional requirements on the regional, national or sub-national level.	<p>PEFC Denmark comment: “Not relevant in the Danish system.”</p> <p>Assessment decision: N/A</p> <p>Justification: The benchmark requirement is not relevant in the Danish system.</p>	Please consider to revise this and assess it as conformity, because the Danish system applicable at national level.	<p>Wording changed to: PEFC Denmark comment: “Not relevant in the Danish system.”</p> <p>Assessment decision: Conformity Justification: The standard does not define additional requirements on the regional, national or sub-national level. As the benchmark is permissive rather than obligating, the benchmark is met.</p>
PEFC Checklist - Group Forest Management Certification (PEFC ST 1002:2018), 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	<p>PEFC Denmark comment: “Participation of pre-existing organisations or group or the members participation is not possible in the danish system. “</p> <p>Assessment decision: N/A</p> <p>Justification: Participation of pre-existing organisations or group or the members participation is not an option in the Danish PEFC System.</p>	Please revisit this assessment decision, because there's nothing in the Danish system, which would prevent a pre-existing organization with forest property to join the group certification	<p>Wording changed to:</p> <p>PEFC Denmark comment: “Participation of pre-existing organisations or group or the members participation is not possible in the danish system.”</p> <p>Assessment decision: Minor Nonconformity Justification: The Danish PEFC System does not formally exclude participation of pre-existing organisations or group or the</p>

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which have their own members.			members.