

PEFC Council

Conformity Assessment of the Revised American Tree Farm System Against the PEFC Council Requirements

Final Report

Helsinki, Finland
October 18, 2022

8798
ID 146674





DISCLAIMER

Indufor makes its best effort to provide accurate and complete information while executing the assignment. Indufor assumes no liability or responsibility for any outcome of the assignment.

Copyright © 2022 Indufor

All rights reserved. No part of this publication may be reproduced or transmitted in any form or by any means, electronic or mechanical, including, but not limited to, photocopying, recording or otherwise.

TABLE OF CONTENTS

1.	INTRODUCTION	1
2.	RECOMMENDATIONS	3
3.	SUMMARY OF FINDINGS	4
3.1	Structure of the American Tree Farm System	4
3.2	Standard-Setting Procedures	4
3.3	Standard-Setting Process	6
3.4	Forest Management Standard	7
3.5	Group Forest Certification Model	8
3.6	Certification and Accreditation Procedures	9
4.	MATERIAL AND METHODS	11
4.1	Material	11
4.2	Methods	13
5.	STRUCTURE OF THE PROPOSED APPLICANT SYSTEM	14
6.	STANDARD-SETTING PROCEDURES	16
6.1	Introduction	16
6.2	Findings of the assessment	16
6.3	Assessment of conformity	18
7.	STANDARD-SETTING PROCESS	19
7.1	Introduction	19
7.2	Findings of the assessment	19
7.3	Assessment of conformity	20
8.	FOREST MANAGEMENT STANDARD	21
8.1	Introduction	21
8.2	Findings of the assessment	22
8.3	Assessment of conformity	25
9.	GROUP CERTIFICATION MODEL	26
9.1	Introduction	26
9.2	Findings of the Assessment	26
9.3	Assessment on conformity	27
10.	CERTIFICATION AND ACCREDITATION ARRANGEMENTS	28
10.1	ATFS requirements for certification and accreditation	28
10.2	Notification of Certification Bodies	29
11.	STAKEHOLDER VIEWS	30
11.1	International Consultation	30
11.2	National Consultation on Standard-Setting	30

LIST OF ANNEXES

Annex 1	PEFC Standard and System Requirements Checklist	
	– Certification and Accreditation Procedures (Annex 6)	33
	– Standard Setting Procedures and Process (PEFC ST 1001:2017)	45
	– Sustainable Forest Management (PEFC ST 1003:2018)	95
	– Group Forest Management Certification (PEFC ST 1002:2018)	167
	– Scheme Administration (PEFC GD 1004:2009)	211

LIST OF FIGURES

Figure 1 Structure of the American Tree Farm System

14

ABBREVIATIONS

AFF	American Forest Foundation
ANAB	ANSI-National Accreditation Board
ATFS	American Tree Farm System
CB	Certification body
DAP	Dispute and Appeals Procedures of the ATFS
ERGC	Eligibility Requirements and Guidance for Certification of the ATFS
IAF	International Accreditation Forum
IAMAW	International Association of Machinists and Aerospace Workers
IMG	Independently Managed Group Certification Standards of the ATFS
ISRP	Independent Standard Review Panel
NGB	National Governing Body
NSIC	National Standards Interpretation Committee
PEFC	Programme for the Endorsement of Forest Certification
SCC	Standards Council of Canada
SFI	Sustainable Forestry Initiative
SFM	Sustainable forest management
SS	Standards of Sustainability of the ATFS
SSP	Standard Setting Procedures of the ATFS
STFP	State Tree Farm Programs



Indufor

Indufor Oy

Contact:

Thomas Selänniemi

Head of NRM

thomas.selanniemi@induforgroup.com

Indufor Oy

Esterinportti 2

FI-00240 Helsinki

FINLAND

Tel. +358 50 321 8217

Fax +358 9 135 2552

indufor@induforgroup.com

www.induforgroup.com

1. INTRODUCTION

Background

The American Tree Farm System (ATFS), i.e., the Scheme, is governed by the American Forest Foundation (AFF). Its predecessor, American Forest Products Industries, supported already in 1932 forest owners in fire prevention and self-regulation of privately owned forests. In 1941 the ATFS was launched to provide a certificate to participating forest owners. Since then, the Scheme has developed considerably, and its governing body has evolved over the years. In 1981 the AFF was founded to coordinate the educational, scientific and other activities and the ATFS that help forest owners to improve their forest management. In 1990's it was widely recognized that well managed forests provide a broad range of ecosystem services that benefit individual forest owners and communities. The AFF also broadened the focus of its work on awareness raising and capacity building among forest owners. Currently the ATFS certified forests cover over 19 million acres (7.7 million ha) and about 74 000 forest owners have joined the Scheme.

The ATFS was first submitted to PEFC endorsement in 2008. This is the fourth conformity assessment of the Scheme. The AFF organized the in 2020 the revision of the forest management and group certification standards as well as participants' eligibility requirements for ATFS certification. The revised standards were adopted by the AFF Board in November 2020 and submitted to the PEFC Council re-endorsement in March 19, 2021.

The objective of this conformity assessment is to verify the compliance of the revised ATFS standards with the international PEFC requirements. The assessment will cover the ATFS procedures and processes for standard setting, scheme implementation, certification arrangements and performance requirements for forest management.

The AFF applied for a limited assessment focusing only on the changes made since the past endorsement in 2017, as described in the PEFC GD 1007 clause 6.3.2. However, the assessment contract between Indufor and the PEFC Council requires an assessment against the full PEFC benchmark (ref. clause 6.3.1), including all elements of clause 6.1.2. This approach is justified because the PEFC Council has revised most of the benchmark standards since the previous endorsement. The ATFS does not include any provisions for chain of custody certification or the issuance of the PEFC logo, because forest industry applies PEFC endorsed SFI chain of custody and logo use requirements.

The draft report of this assessment, delivered to the PEFC Council on October 21, 2021, included a large number of non-conformities. Subsequently, the PEFC Council and the AFF decided on an interruption of the assessment process for the AFF to review the ATFS documentation. Updated ATFS technical documentation¹ were submitted by the AFF for conformity assessment on March 29, 2022. An initial assessment of these documents revealed that some major non-conformities remained in the sustainable forest management standard. Consequently, the assessment process was delayed one more time until revised drafts of the Standards of Sustainability and the Eligibility Requirements and Guidance for Certification documents were submitted by the AFF on June 22, 2022, though with their final approval according to the AFF internal processes still pending.

Scope of this report

The final draft report on the *Conformity Assessment of the Revised American Tree Farm System Against the PEFC Council Requirements* was delivered to the PEFC Council on July 4, 2022. The final draft report takes into considerations the revision of the ATFS technical documentation.

¹ American Forest Foundation (AFF) 2021 Standards of Sustainability V 2.0,
2021 Independently Managed Group (IMG) Certification Standards V2.0,
American Tree Farm System Eligibility Requirements and Guidance for Certification V2.0,
American Tree Farm System Internal Monitoring Process and Procedures 2021 V2.0

The report is submitted to the PEFC Secretariat and will be completed as a final assessment report after receiving the comments as part of PEFC's internal review.

The structure of the report is as follows:

Chapter 1 describes the objective and process of the independent assessment.

Chapter 2 states the Indufor's recommendation on the endorsement of the ATFS to the PEFC Board of Directors and specifies possible conditions the Board should take into consideration in the decision-making.

Chapter 3 describes a summary of findings for each Scheme element and gives justifications for the given recommendation.

Chapter 4 presents the assessment methods and material used.

Chapter 5 describes the structure of the ATFS and the procedures for scheme revision. It also evaluates how the written procedures were implemented in the standard and rules development.

Chapter 6 assesses the ATFS standard-setting procedures against the PEFC requirements.

Chapter 7 reviews the implemented standard setting process.

Chapter 8 describes the requirements of the forest management standard in view of the PEFC requirements.

Chapter 9 assesses ATFS requirements for group certification and their compliance with the PEFC requirements.

Chapter 10 reviews the ATFS requirements for certification and accreditation procedures including notification of certification bodies.

Chapter 11 gives a summary of the received stakeholder comments and explains their consideration in the assessment.

Annex 1 includes the checklists with Indufor's conclusions on ATFS 2021-2025 conformity with each PEFC requirement and lists the reference documents that provide the basis for the conclusions.

2. RECOMMENDATIONS

Indufor recommends that the PEFC Council **endorses** the revised American Tree Farm System (ATFS) **on the condition** that the remaining thirty-six (36) minor non-conformities, the absolute majority of which are in the standard setting procedures and sustainable forest management standard, shall be corrected within six (6) months after endorsement.

The minor non-conformities and comments are described in Chapter 3 (Summary of the Findings).

The ATFS includes three different certification options for forest owners: certification through the State Tree Program (STFP) program, the Independently Managed Group (IMG) programs and the Individual Third-party Certificates. The first and second options are group certificates, but the ATFS does not include normative standards on management of the group certificates under the STFP. Consequently, the forest owners under the STFP are committed to follow the AFF Standards of Sustainability, but whether the management of the group certificate fulfils PEFC requirements was not covered by this endorsement assessment. This is an issue that may need further considerations by PEFC and the AFF.

The assessed MoU between SFI and AFF also does not reflect on the different status of the STFPs in relation to the way they may enter in the chain of custody system.

3. SUMMARY OF FINDINGS

3.1 Structure of the American Tree Farm System

The ATFS is managed by the American Forest Foundation (AFF). The AFF Certification Manager is responsible for the day-to-day management of the Scheme. The AFF Board of Directors is the highest decision-making body in the ATFS, responsible for initiating the standard revision process, approving the Standards, making them publicly available as well as submitting the ATFS Standards to PEFC for endorsement.

The Independent Standard Review Panel (ISRP) is convened by the AFF Board of Directors to review the Standards and make recommendations for modification. The ISRP is comprised of a representative cross-section of forestry community leaders with a stake in the ATFS certification program or a sincere interest in forest sustainability on small forest ownership in the US.

The National Standards Interpretation Committee (NSIC) is appointed by the AFF Board of Directors. The NSIC is responsible for interpretation of the ATFS Standards in between the periodic review.

The Sustainable Forestry Initiative (SFI) is through cooperation agreement with the AFF (Memorandum of Understanding) the National Governing Body (NGB) in the US for PEFC and hence representing both the SFI and the AFF in the PEFC Council. The SFI also is the body responsible for notification of certification bodies for the ATFS.

Landowners with forest land between 10 acres and 20,000 acres are eligible to apply for the ATFS certification. The ownership must be privately held or held by a public entity. The properties must be nonindustrial but may be associated with small local business. The ATFS includes three different certification options for landowners: State Tree Farm Programs (STFPs), Independently Managed Group programs, and Individual third-party certificates. The first and second options are group certificates. The group certificates under STFPs are not covered by this endorsement assessment.

3.2 Standard-Setting Procedures

The Standard Setting Procedures (SSP) from November 11, 2019 is the primary ATFS equivalent to the PEFC ST 1001:2017. In addition, the AFF Dispute and Appeals Procedures (DAP) complements the SSP by providing requirements for processing complaints and appeals.

The assessment of the SSP and the DAP against the PEFC ST 1001:2017 identified a total of 15 minor non-conformities in the ATFS procedures. No major non-conformities were identified. The minor non-conformities included the following:

- **Minor non-conformity:** Benchmark 5.1.2. The benchmark requires that the standardising body shall review its standard-setting procedures regularly. However, the SSP only addresses review of the standard itself and not review of the standard-setting procedures.
- **Minor non-conformity:** Benchmarks 6.1.1 e & 6.1.2. The benchmark requires that the standardising body shall develop a proposal for the standard, including a description of the stages of standard development and their expected timetable. The SSP does not explicitly feature the concept of standard proposal prior to working group inputs or place requirements for the contents of such proposal.
- **Minor non-conformity:** Benchmark 6.3.1. The benchmark sets requirements for information to be included in the public announcement of the start of the standard-setting process and the invitation to stakeholders to participate. The SSP does not specify contents required for this announcement and invitation (sub-requirements a, b, c, e, f).
- **Minor non-conformity:** Benchmark 6.3.2. The benchmark requires that the standardising body shall review the standard-setting process based on feedback

received in response to the public announcement. The SSP does not require a review of the standard-setting process.

- **Minor non-conformity:** Benchmark 6.4.3. The SSP neither requires target-setting for participation of key stakeholders nor proactive outreach to seek their participation.
- **Minor non-conformity:** Benchmark 6.4.6. The SSP does not include guidelines for determining decision-making thresholds for consensus quantification.
- **Minor non-conformity:** Benchmark 6.4.7 c. The benchmark requires that additional round(s) of public consultation are organized where further stakeholder input can help to achieve consensus on unresolved issues. This resolution mechanism is not featured in the ATFS.
- **Minor non-conformity:** Benchmark 6.5.1. The SSP lacks the benchmark requirements that a direct invitation to comment a standard enquiry draft should be proactively sent to each stakeholder identified in the stakeholder analysis, and that the invitations should be sent to disadvantaged and key stakeholders through specifically considered methods (sub-requirements b & c).
- **Minor non-conformity:** Benchmark 7.2.2. The SSP lacks requirements for information that the benchmark requires to be included in the standards (sub-requirements a, b, d).
- **Minor non-conformity:** Benchmark 7.2.3. The SSP does not require making the standard available in printed copies, while such requirement is stipulated by the benchmark.
- **Minor non-conformity:** Benchmark 8.2.1. The benchmark requires that the standardising body shall establish and maintain a permanent mechanism for collecting and recording feedback on a standard and this mechanism shall be accessible online. The ATFS has no adequate requirements for such mechanism. The DAP cannot be considered as the type of feedback mechanism intended in the benchmark.
- **Minor non-conformity:** Benchmark 8.2.2. The benchmark requires that all feedback received through all channels, including meetings, training courses, etc. shall be recorded and considered. The feedback recording and consideration procedures stipulated by the SSP focus on the standard setting/revision process and omit any feedback received throughout the standard's life span.
- **Minor non-conformity:** Benchmarks 8.3.1 & 8.3.2. The PEFC ST 1001:2017 section 8.3 requires that a gap analysis is carried out at the start of the standard review according to specifications defined under 8.3.1 and 8.3.2. This step is not explicitly featured in the SSP.
- **Minor non-conformity:** Benchmark 9.1. The benchmark requires that the procedures for revision of standard(s)/normative document(s) shall conform to those stated in section 6 of the PEFC ST 1001:2017. However, as elaborated above, the ATFS includes non-conformities with the procedures required by benchmarks 6.1.1 e; 6.1.2; 6.3.1 a, b, c, e, f; 6.4.3; 6.4.6; 6.4.7 c; 6.5.1 b, c.
- **Minor non-conformity:** Benchmarks 9.4.1, 9.4.2 & 9.4.3. The benchmark requires that a revision shall define the application date and transition period of the revised standard(s)/normative document(s). It also sets requirements for the date and the transition period. The SSP does not set corresponding requirements.

Comments:

- Concerning benchmark 6.5.2, it is recommended that the requirement of a second round of public consultation for new standards is included in the SSP.

- Concerning benchmark 8.2.1, the ATFS website provides a channel for feedback concerning the standard, but it is recommended that the feedback provision aspect is made explicit on the website.

The assessor's view is that the identified non-conformities in the procedures do not compromise the integrity of the certification scheme. This is supported by the conclusion that despite the shortcomings in the stipulated procedures, the PEFC-required process itself was largely followed (see section 3.3 below). **Subject to the condition that the remaining minor non-conformities are adequately addressed** within a six-month period, the standard-setting procedures and process **comply** with the PEFC requirements.

3.3 Standard-Setting Process

The applied standard-setting process was assessed for conformity against the PEFC ST 1001:2017. The assessment was based on the set of supporting documents provided by the AFF that included documentation of the process (see section 4.1) as well as on any additional information that was made available to the assessor during the assessment.

The assessment identified 5 minor non-conformities; notably less than in the standard-setting procedures. This indicates that the implemented process was largely in line with the PEFC requirements despite the shortcomings in the written ATFS procedures. The identified non-conformities included the following:

- Minor non-conformity:** Benchmark 6.5.1 g. There is no documentation that outcomes of considering issues raised in the public feedback would have been compiled, made public and sent to each stakeholder/party that gave feedback as required by the benchmark.
- Minor non-conformity:** Benchmark 7.2.2 b. The official language of the standards is not explicitly defined in the standards as required, though the context of the standards practically establishes English as their official language.
- Minor non-conformity:** Benchmark 7.2.4. Not all files/documents that comprise the ATFS development report as defined by the PEFC GD 1007 have been made publicly available as required by the benchmark.
- Minor non-conformity:** Benchmark 8.2.2. The benchmark requires that all feedback received through all channels, including meetings, training courses, etc. shall be recorded and considered. It remains unclear how feedback received outside of the specific public consultation periods is addressed within the ATFS.
- Minor non-conformity:** Benchmark 9.1. The benchmark requires that the process for revision of standard(s)/normative document(s) shall conform to that stated in section 6 of the PEFC ST 1001:2017. However, as elaborated above, the ATFS includes non-conformity with the process required by benchmark 6.5.1 g.

Comments:

- Concerning benchmark 8.2.1, the ATFS website provides a channel for feedback concerning the standard, but it is recommended that the feedback provision aspect is made explicit on the website.

The assessor's view is that the identified non-conformities in the standard-setting process do not compromise the integrity of the certification scheme. **Subject to the condition that the remaining minor non-conformities are adequately addressed** within a six-month period, the standard-setting procedures and process **comply** with the PEFC requirements.

3.4 Forest Management Standard

The ATFS requirements for sustainable forest management are described in American Forest Foundation (AFF) 2021 Standards of Sustainability V 2.0 (SS) from March 10, 2022. The SS is the equivalent for the PEFC ST 1003:2018. The SS includes eight thematic Standards issuing both binding and non-binding guidelines on sustainable forest management. Additional normative and descriptive ATFS documents as well as other relevant documents were used to support the assessment of conformity (see section 4.1).

The PEFC ST 1003:2018 places various management requirements on “the organisation”, referring to the certificate holder. The ATFS includes three different certification options for landowners, in which the certificate holder is either an organisation (State Tree Farm Programs and IMGs) or the individual landowner directly (individual third-party certificates). Since State Tree Farm Programs are outside the scope of this assessment, the conformity assessment requires consideration of the remaining two options, in which the organisation is either an individual landowner or an IMG. The latter is mainly addressed in the ATFS IMG Standard.

Conformity assessment of the sustainable forest management requirements yielded 15 minor non-conformities and no major non-conformities. The identified non-conformities were the following:

- **Minor non-conformity:** Benchmark 4.1 i. When requirements of the benchmark standard are not reflected in the national standard because they are already addressed through legislation, the benchmark requires that an overview of applicable legislation is provided. There are shortcomings in providing reference to applicable legislation in relation to benchmarks 6.3.1.3, 6.3.2.1, 6.3.2.2, 6.3.4.3, and 8.1.4.
- **Minor non-conformity:** Benchmark 4.2. The SS places no requirements on individual certificate holders to determine the affected stakeholders or their relevant needs and expectations (sub-requirements a & b).
- **Minor non-conformity:** Benchmark 6.3.1.2. The PEFC ST 1003:2018 requires organisations to comply with relevant international legislation, but the SS makes no reference to this.
- **Minor non-conformity:** Benchmark 6.3.1.3. Reference needs to be made to relevant U.S. anti-corruption legislation as per the requirement of benchmark 4.1 i.
- **Minor non-conformity:** Benchmarks 6.3.2.1 & 6.3.2.2. It is not described clearly how customary and traditional rights related to the forest land are clarified, recognised and respected in the context of the ATFS. If relying on U.S. legislation, reference needs to be made to relevant legislation defining and protecting property rights, including customary and traditional rights, as per the requirement of benchmark 4.1 i.
- **Minor non-conformity:** Benchmark 6.3.4.3. Reference needs to be made to relevant legislation as per the requirement of benchmark 4.1 i.
- **Minor non-conformity:** Benchmark 7.4.1. The benchmark requires that appropriate mechanisms are in place for resolving complaints and disputes specifically relating to the following topics: forest management operations, land use rights and work conditions. The ATFS operates a general dispute resolution mechanism guided by the DAP, but the topics defined by the benchmark are outside of its scope, as is the level at which the disputes are dealt with. The benchmark concerns the certificate holder level whereas the DAP concerns the system level.
- **Minor non-conformity:** Benchmark 8.1.3. The SS does not place a requirement of climate positive practices to management operations, and it has not been shown that this aspect is sufficiently covered in the state-level best management practices (BMPs).

- **Minor non-conformity:** Benchmark 8.1.4. Forest conversion is not directly addressed in the SS (including the exceptions listed in the benchmark sub-requirements a–e), though conversion of the forest to another use would disqualify the property from ATFS eligibility and the property would be decertified. Currently the ATFS relies largely on legislation on the matters related to forest conversion. Reference needs to be made to relevant legislation as per the requirement of benchmark 4.1 i, including the legal definition of forest land.
- **Minor non-conformity:** Benchmark 8.1.5. The SS prohibits any afforestation activities that negatively impact ecologically important non-forest areas. However, it lacks a comprehensive definition for negative impacts and has no consideration of the PEFC ST 1003:2018 exceptions related to the afforestation restriction (sub-requirements a–f).
- **Minor non-conformity:** Benchmark 8.1.6. The ATFS does not include a description of a stakeholder consultation process, an assessment of causes of forest degradation, or assessment of forest recovery status associated with conversion of degraded forests to forest plantations (sub-requirements b, g, h).
- **Minor non-conformity:** Benchmark 8.2.7. The SS does not explicitly meet the benchmark requirement on pesticide use documentation.
- **Minor non-conformity:** Benchmark 8.4.5. The SS does not explicitly meet the benchmark requirement on only using such introduced species whose impacts on the ecosystem and on the genetic integrity of native species and local provenances have been scientifically evaluated. Instead, the SS relies on a landowner's voluntary consultation with a qualified professional on the matter.
- **Minor non-conformity:** Benchmark 9.2.1. The ATFS requirements for the internal audit concerning individual certificate holders omit inspection of conformity with their defined management systems, including assessment on whether it is effectively implemented and maintained (sub-requirements a & b).
- **Minor non-conformity:** Benchmark 10.1.1. While the ATFS incorporates a process of identifying and addressing nonconformities, there are no requirements for individual certificate holders to evaluate the need for action to eliminate the causes of the non-conformity or implement any action as a response to the evaluation, including changes to the management system if necessary (sub-requirements b, c, e).

Comments:

- Concerning the benchmark 8.1.4, it is recommended that the SS is revised to accommodate standards for forest conversion in order to be explicitly in line with the PEFC ST 1003:2018 requirements.

The ATFS sustainable forest management requirements still involve many non-conformities, but these are all minor. The assessment concludes that **subject to the condition that the remaining minor non-conformities are adequately addressed** within a six-month period, the sustainable forest management standard **complies** with the PEFC requirements.

3.5 Group Forest Certification Model

The Independently Managed Group Certification Standards 2021 (IMG) is the ATFS equivalent to the PEFC ST 1002:2018 and provide requirement for the group certification under the Independently Managed Group programs. The IMG specifically notes that this standard is not applicable on the State Tree Farm Programs (STFPs). Consequently, the group certificates under the STFC are not covered by this endorsement assessment. There are 11.3 million acres of forests certified by the ATFS under the STFP.

The conformity assessment² of the ATFS group forest management standard (IMG) against PEFC ST 1002:2018 resulted in a total of 62 non-conformities and a conclusion that the ATFS standard for group forest management does not comply with the PEFC requirements. The AFF and PEFC International mutually decided to interrupt the assessment process to allow for updating relevant standards of the ATFS, including the standard on group certification. The updated ATFS standard on group certification, the *2021 Independently Managed Group Certification Standards V2.0* (IMG) was submitted for assessment on 29th of March 2022.

The IMG define the group organisation structure to include Group Entity, Group Manager, Group Member³ and Group Organisation. Their internal relationship as well as roles and responsibilities for management and continuous improvement of performance are defined. The IMG require the group organisation to have in place a dispute resolution mechanism. The Group Management System is described including its role in planning and operation and recordkeeping. Performance evaluation is outlined in the IMG including an internal monitoring program and the internal audit program and the sampling for the latter.

The assessment resulted in one non-conformity:

- **A minor non-conformity** remains on the requirement on the function and responsibilities of participants (PEFC Benchmark 5.1.2 a). Here PEFC ST 1002:2018 defines that group participants excluded from any certification group cannot apply for group membership within 12 months after exclusion, while IMG talks about re-admittance, which implies restricting the exclusion only to the IMG from which the group member was excluded. Hence the requirement in the IMG is narrower than the PEFC ST 1002:2018.

The assessment concludes that the *2021 Independently Managed Group Certification Standards V2.0* (IMG) **comply** with the PEFC requirements, provided that the remaining minor non-conformity is addressed as required.

3.6 Certification and Accreditation Procedures

The ATFS requirements for certification and accreditation

The ATFS does not have own documents defining the rules for certification and accreditation. The Scheme is committed to follow the rules defined in PEFC Annex 6. AFF does not make any reference to PEFC Annex 6 but the ANAB accreditation rule does.

The ATFS is applied only in the US and the national accreditation body ANSI-National Accreditation Board (ANAB) has developed an Accreditation Programme for American Tree Farm System (Accreditation Rule 27, June 30, 2020). The Standards Council of Canada (SCC) also refers to the ATFS in its accreditation programme, but the detailed rules make reference only to SFI and Canadian CSA certification programs.

ANAB accreditation rule includes PEFC Annex 6 and ISO 17021 standard on *Conformity assessment – Requirements for bodies providing audit and certification of management systems* as benchmark documents for accreditation services. Both standards require that certification bodies are impartial and independent from certified activities or standard setting. The Scheme does not have additional requirements for CBs or auditors compared to ISO 17021 standard that requires well qualified certification and audit procedures. Adoption of PEFC Annex 6 as such ensures that the Scheme has complying requirements for certification and accreditation.

ATFS/AFF has adopted international PEFC Certification and Accreditation Procedures Annex 6). This takes place through ANAB Accreditation Rule 27 that lists all the benchmark

² The Draft Report of the conformity assessment was submitted by the assessor to PEFC October 21, 2021.

³ The Group Member is equivalent to “participant” in the PEFC ST 1002:2018.

requirements for its accreditation of certification bodies for ATFS certification. This list includes PEFC Annex 6 and ISO 17021 standard. The ATFS documentation does not include any direct provisions for accreditation. This gap in scheme documentation s raised as a comment (PEFC Annex 6 checklist question 2).

The ANAB Rule 27 and PEFC Annex 6 together set complying requirements for ATFS certification and accreditation procedures. Three comments were raised for further improvement of the Scheme.

Comment: ANAB Accreditation Rule 27 refers to the old version of the ATFS SFM standards (2015-2020).

NOTE Regional group certification is not covered by this assessment, although ANAB accreditation services also include regional group certifications made up of state programs.

Comment: The AFF shall provide written evidence that it has adopted PEFC Annex 6 as a scheme specific rule for accreditation of certification bodies.

Comment: ANAB requirements are addressed only through the list of requirement documents. Substantially the ISO 17021-1 set the baseline requirement and as ANAB applies PEFC Annex 6 in ATFS certification, there is a conformance with this specific requirement of Annex 6

Detailed conformance analysis between the ATFS certification and accreditation procedures are presented in Annex 1.

Notification of Certification Bodies

The AFF has outsourced notification of the ATFS certification bodies to the SFI in line with the Memorandum of Understanding and related 2021 SFI Service Agreement with the AFF (May 2021). The SFI is the PEFC Governing body in the US. Thus, the SFI is responsible for notification of ATFS certification bodies. The service agreement is in force for a calendar year 2021 and up till now it has been renewed as appropriate.

The notification arrangements comply with the PEFC requirements.

Comment: The ATFS should describe in its own documentation the approach it has to ensure the notification of certification bodies (CBs). Now the issue is addressed only in the Service Agreement signed for each calendar year.

4. MATERIAL AND METHODS

4.1 Material

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

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

- ATFS Eligibility Requirements and Guidance for Certification
- American Forest Foundation (AFF) 2021 Standards of Sustainability
- ATFS Independently Managed Group (IMG) Certification Standards 2021.
- AFF Standard Setting Procedures
- AFF Dispute and Appeals Procedures
- American Tree Farm System Certifier Eligibility Requirements

Normative documents

ATFS Document	Date of issuance	Received by assessor
ATFS Eligibility Requirements and Guidance for Certification V2.0		June 22 ⁴ , 2022
American Forest Foundation 2021 Standards of Sustainability V 2.0		June 22 ⁴ , 2022
ATFS 2021 Independently Managed Group (IMG) Certification Standards V2.0	March 10, 2022	March 29, 2022
ATFS Internal Monitoring Process and Procedures 2021 V2.0	March 10, 2022	March 29, 2022
ANAB Accreditation Rule 27, June 30, 2020	June 30, 2020	June 18, 2021
ANAB's Accreditation Rule 16	Jul 9, 2018	August, 2021
SCC Accreditation Rule, March 7, 2021	Mar. 7, 2021	June 18, 2021
ATFS and SFI Service Agreement with annexes	Jan 1, 2021	June 18, 2021
PEFC Annex 6, Certification and Accreditation Procedures	Oct. 5, 2007	June 18, 2021

Descriptive documents

ATFS Documentation Part	Date of issuance	Received by assessor
2020 Public Summary Report. American Tree Farm System (ATFS) Northeast, Southern and West Central Regions. American Forest Foundation 2015-2020 Standards of Sustainability for Forest Certification (AFF Standard)	Dec. 18, 2020	June 18, 2021
American Tree Farm System Volunteer No Harassment Policy	Sept. 6, 2017	Oct. 4, 2021
MOU Agreement Between The American Tree Farm System And International Association of Machinists and Aerospace Workers (IAMAW)	Nov. 12, 2007	June 18, 2021

⁴ First update was received by the assessor on March 29, 2022. Due to the assessment resulting in major non-conformities, the document was once again updated by AFF and sent to the assessor as a draft version on June 22, 2022.

Other documents	Date of issuance	Received by assessor
ATFS group certification process – 2021 Annual Reporting		June 18, 2021
ATFS Standard Operating Procedures for Regional State Program Forest Owner Group Certification		June 18, 2021
5 Cert Com Standards Setting Procedures Memo FINAL.pdf		Oct. 8, 2021
AFF PEFC Gap 090619.xlsx		Sept. 17, 2021
ATFS Alert Announcing Intent to Revise AFF Standards.pdf		Sept. 17, 2021
Consensus Release 091420 [11 files]		Sept. 23, 2021
Consensus Release 091420.doc		Sept. 23, 2021
ISRP Conference Call Notes 1.6.20 (1).docx		Sept. 17, 2021
ISRP WebEx Notes [9 files]		Sept. 23, 2021
Public Comment Period #1 – Summary.docx		Sept. 23, 2021
Public Comment Period #2 - consideration and actions of ISRP.xlsx		Sept. 23, 2021
Stakeholder Mapping 2021 ISRP.xlsx		Sept. 17, 2021
Standards Revision Memo from NSIC ISRP to Board.docx		Oct. 8, 2021
Survey response Standard Setting Procedure 092319.docx		Oct. 8, 2021
Forest Practice Administrative Rules and Forest Practices Act. Chapter 629 Forest Practices Administration. Oregon Department of Forestry,	Febr. 2018, corrections April 2018	Sept. 23, 2021
Georgia's Best Management Practices for Forestry. Georgia Forestry Commission.	2019	Sept. 23, 2021
Montana Forestry Best Management Practices. Montana Department of Natural Resources and Conservation.	2015	Sept. 23, 2021
Vermont Water Quality. Acceptable Management Practices. Manual for Logging Professionals. Vermont Agency of Natural Resources	2019	Sept. 23, 2021

Following the Indufor draft report, submitted on October 21, 2021, the PEFC Council and the AFF decided in an interruption of the assessment process for the revision of the ATFS documentation. The revised ATFS documentation was provided to the assessor March 29, 2022.

An initial assessment of the revised documents revealed that the ATFS requirements for sustainable forest management involved some remaining non-conformities. Consequently, the AFF produced and submitted once more revised versions of the documents ATFS Eligibility Requirements and Guidance for Certification V2.0 and American Forest Foundation 2021 Standards of Sustainability V 2.0. These documents were submitted to the assessor on June 22, 2022. At the date of this final draft report, these two documents were still under draft status with the final approval by the standardising body pending.

The final draft report was submitted on July 4, 2022, to the PEFC Council for comments.

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

1. Standard setting requirements: PEFC ST 1001:2017, Standard Setting – Requirements.
2. Forest management requirements: PEFC ST 1003:2018, Sustainable Forest Management – Requirements.
3. Group certification requirements: PEFC ST 1002:2018, Group Forest Management Certification – Requirements.

4. Certification & accreditation: PEFC Council Technical Document, Annex 6 (forest management certification), PEFC ST 2003:2012, Requirements for Certification Bodies operating Certification against the PEFC International Chain of Custody Standard (chain of custody certification).

4.2 Methods

The assessment was carried out as a desk study based on the documentation listed above and clarifications provided by the AFF. In addition, consultations with stakeholders were carried out in two separate processes. PEFC on its website announced public consultations in June 2021 and the assessor sent questionnaires to a total of 98 stakeholders to inquire about their views on the standard setting process and on its performance in October 2021. Altogether 15 answers were received. The questionnaire is in Annex 2.

The stakeholder consultations were carried out prior to the interruption of the assessment process. Consequently, the consultations concerned the ATFS documentation prior to the revision of the Standards and therefore not the revised documents submitted by AFF for conformity assessment on March 29, 2022.

The following grading of conformity levels was used in the assessment (Box 4.1).

Box 4.1 Assessment Scales Used in Conformity Evaluation

Conformity

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

Minor non-conformity

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

Major non-conformity

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

NA

Not applicable.

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

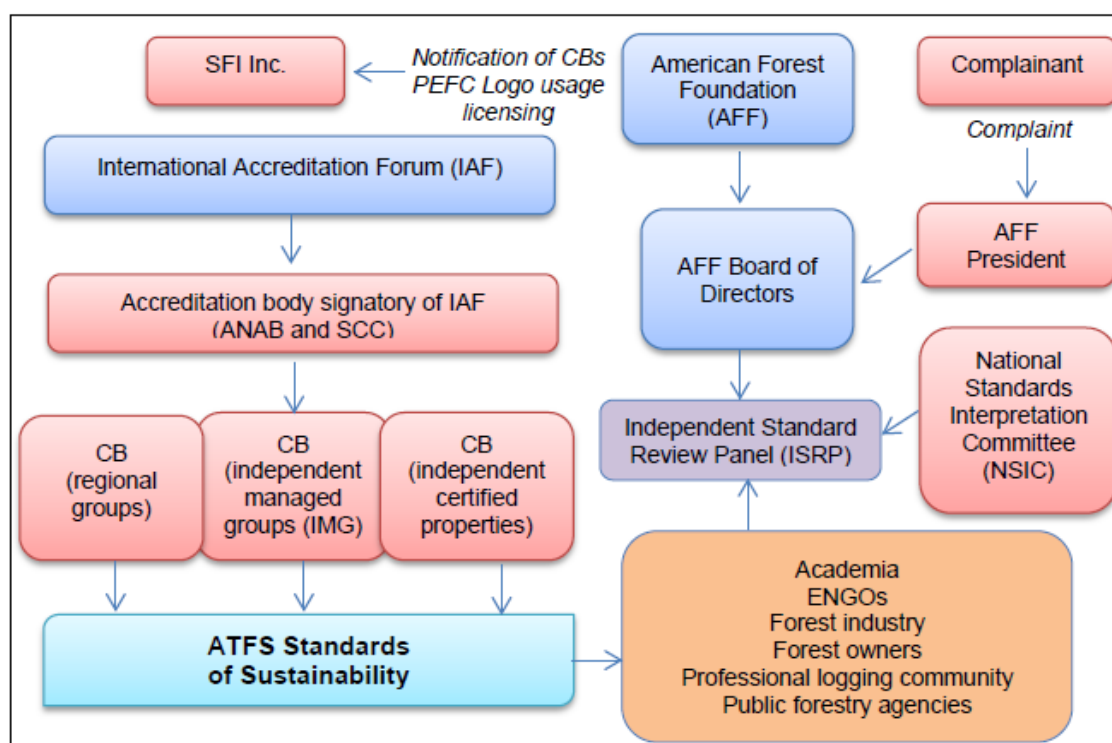
PEFC requirements were classified as not applicable e.g., if they address a scheme development phase that is not relevant for AFTS (i.e., requirements for scheme revision or dispute resolution process in the case where no disputes have been raised to implement the planned procedures).

This report presents a detailed summary of the ATFS conformity to PEFC requirements and justifies the conclusions made. Appendix 1 lists detailed conclusions for each individual PEFC requirement.

5. STRUCTURE OF THE PROPOSED APPLICANT SYSTEM

The ATFS is managed by the American Forest Foundation and it is the oldest certification scheme in the US, established in 1941. The ATFS is endorsed by PEFC. The Sustainable Forestry Initiative (SFI) is through cooperation agreement with the AFF (Memorandum of Understanding) the National Governing Body (NGB) in the US for PEFC and hence representing both the SFI and the AFF in the PEFC Council. The SFI also is the body responsible for notification of certification bodies for the ATFS.

Figure 1 Structure of the American Tree Farm System



Scheme organisation

Institutions within the scheme management include the AFF Board of Directors, the Independent Standard Review Panel (ISRP) and the National Standards Interpretation Committee (NSIC).

The AFF Certification Manager is responsible for the day-to-day management of the ATFS certificate and participates in the NSIC. The purpose of the NSIC is to work with AFF staff to ensure credible implementation of the AFTS certification program. The NSIC will provide expertise and advice to staff on implementation of AFF Standards, third party certification and implementation of the ATFS certification via individual certification, Independently Managed Groups, and regional certificates.

The AFF Board of Directors (Board of Trustees) is with regards to the ATFS responsible for:

- Initiating the ATFS standard revision process and convening the ISRP.
- Approving the ATFS Standards and making them publicly available.
- Submitting the ATFS Standards to PEFC for endorsement.
- Attend to complaints addressed to the Board (following due procedures).

The ISRP is convened by the AFF Board of Directors for the purpose of reviewing the ATFS Standard and making recommendations for modification or improvements. The ISRP is

constituted until it has presented its findings to the AFF Board. The ISRP is comprised of a representative cross-section of forestry community leaders with a stake in the ATFS certification program or a sincere interest in forest sustainability on small forest ownership in the US.

The NSIC is appointed by the AFF Board of Directors. The NSIC is responsible for interpretation of the ATFS Standards in between the periodic review.

Organisations in certification and accreditation

The AFF has adopted the PEFC Annex 6 as scheme specific requirements for certification and accreditation procedures. Thus, independent and accredited certification bodies carry out third party certification in the ATFS. ANAB (ANSI National Accreditation Board) is the US accreditation body that has developed an accreditation program for the ATFS (ANAB Accreditation Rule 27). The ATFS certification is mainly implemented in the US. However, also Standards Council of Canada (SCC) has an accreditation program applicable to certification bodies carrying out ATFS certification (SCC Requirements and Guidance for the Management Systems Accreditation Program: Sustainable Management Sector Schemes). Both accreditation bodies are recognized members of International Accreditation Forum (IAF) and thus comply with international standards on accreditation services.

Applicants

Landowners with forest land between 10 acres and 20,000 acres are eligible to apply for the ATFS certification. The ownership must be privately held or held by a public entity. The properties must be nonindustrial but may be associated with small local business.

The ATFS includes three different certification options for landowners⁵:

- i. State Tree Farm Program. Within this program there are 3 regional group certificates covering a total of 11.36 million acres of forests.
- ii. Independently Managed Group programs. The group forest management certificates held by designated Group Organisations is covering 5.5 million acres of forests.
- iii. Individual third-party certificates. Individual certificate holders cover a total of 835,000 ha of forests.

The responsibilities for the State Tree Farm Programs (STFPs) participating in the certification are outlined in MOUs between the state programs and the AFF. The AFF is responsible for maintaining the regional group certificates including coordination and contracting with the certification body and facilitating the annual surveillance audits. The STFP responsibilities include awareness raising and support to forest owners as well as data collection and management for the ATFS.

The ATFS does not include normative standards on management of the group certificates under the STFPs and the ATFS IMG Standard specifically notes that this standard (i.e., the IMG) is not applicable on the STFPs. Therefore, the group certificates under the STFPs are not covered by this endorsement assessment. There are 11.3 million acres of forests certified by the ATFS under these programs.

⁵ The “SFI Small Lands Group Certification Module” is a new partnership between SFI and AFF. The partnership is under the management of SFI and is hence not listed here and outside the scope of this assessment.

⁶ Figures on certified area provided by AFF in October 2021.

6. STANDARD-SETTING PROCEDURES

6.1 Introduction

The assessment of the standard-setting procedures includes an assessment of conformity between the PEFC ST 1001:2017 and the standard-setting procedures required by the ATFS normative documents. The relevant ATFS normative documents include the following:

- Standard Setting Procedures, November 11, 2019.
- AFF Dispute and Appeals Procedures, May 20, 2021.

The Standard Setting Procedures (hereafter “SSP”) provides the main part of the requirements for setting a new standard or revising an existing standard and is the primary equivalent to the PEFC ST 1001:2017. The AFF Dispute and Appeals Procedures (hereafter “DAP”) provides requirements for processing complaints and appeals, being mainly equivalent to the section 5.3.1 of the PEFC ST 1001:2017.

The SSP does not include a section where the terminology is defined; hence, the applied terminology is interpreted in this assessment as defined in the PEFC ST 1001:2017 or in other normative PEFC documents. In contrast to the PEFC definitions, the SSP occasionally uses the terms “review” and “revision” interchangeably. While generating some vagueness, the issue did not result in direct non-conformities between the SSP and the PEFC ST 1001:2017.

The procedures as required by the SSP and the DAP were assessed against the requirements of the PEFC ST 1001:2017. A summary of the main findings is provided below, following the structure of the PEFC ST 1001:2017. The checklist is included in Annex 1 (PEFC Checklist - Standard Setting Procedures and Process, p. 45).

6.2 Findings of the assessment

Standard-setting Principles

The PEFC ST 1001:2017 includes five key principles for the standard-setting process. These are *stakeholder engagement*, *balanced representation*, *consensus*, *improvement* and *transparency*. Chapter 1 of the SSP concerns standard-setting principles, and the principles listed in the SSP have a high level of alignment with those of the PEFC ST 1001:2017. Each of the five PEFC ST 1001:2017 key principles are also clearly reflected throughout the SSP.

Standardizing Body

The SSP does not include a separate chapter for the standardizing body, and the corresponding contents are found across multiple chapters of the SSP. This chapter in the PEFC ST 1001:2017 includes, among other topics, procedures for handling of complaints and appeals. In the case of the ATFS, these are covered in the separate document, the DAP. The assessment identified one non-conformity:

- **Minor non-conformity:** Benchmark 5.1.2. The benchmark requires that the standardising body shall review its standard-setting procedures regularly. However, the SSP only addresses review of the standard itself and not review of the standard-setting procedures.

Standard-setting Process

The bulk of the contents of the SSP addresses the standard-setting process, having major analogies with the eponymous chapter of the PEFC ST 1001:2017. A notable deviation concerns standard proposal (section 6.1 of the PEFC ST 1001:2017) as the SSP does not feature the concept of standard proposal. While the benchmark requirements for standard proposal are mainly relevant in creation of a new standard, applicable sections are also required to be followed in standard revision, as in the case of the ATFS.

The procedures for stakeholder identification and the subsequent working group engagement were found to be mostly in line with the PEFC ST 1001:2017 requirements. The SSP sets particularly strong requirements for ensuring consensus among the working group.

The assessment identified the following non-conformities in the procedures required by the SSP:

- **Minor non-conformity:** Benchmarks 6.1.1 e & 6.1.2. The benchmark requires that the standardising body shall develop a proposal for the standard, including a description of the stages of standard development and their expected timetable. The SSP does not explicitly feature the concept of standard proposal prior to working group inputs or place requirements for the contents of such proposal.
- **Minor non-conformity:** Benchmark 6.3.1. The benchmark sets requirements for information to be included in the public announcement of the start of the standard-setting process and the invitation to stakeholders to participate. The SSP does not specify contents required for this announcement and invitation (sub-requirements a, b, c, e, f).
- **Minor non-conformity:** Benchmark 6.3.2. The benchmark requires that the standardising body shall review the standard-setting process based on feedback received in response to the public announcement. The SSP does not require a review of the standard-setting process.
- **Minor non-conformity:** Benchmark 6.4.3. The SSP neither requires target-setting for participation of key stakeholders nor proactive outreach to seek their participation.
- **Minor non-conformity:** Benchmark 6.4.6. The SSP does not include guidelines for determining decision-making thresholds for consensus quantification.
- **Minor non-conformity:** Benchmark 6.4.7 c. The benchmark requires that additional round(s) of public consultation are organized where further stakeholder input can help to achieve consensus on unresolved issues. This resolution mechanism is not featured in the ATFS.
- **Minor non-conformity:** Benchmark 6.5.1. The SSP lacks the benchmark requirements that a direct invitation to comment a standard enquiry draft should be proactively sent to each stakeholder identified in the stakeholder analysis, and that the invitations should be sent to disadvantaged and key stakeholders through specifically considered methods (sub-requirements b & c).

Comment: Concerning benchmark 6.5.2, it is recommended that the requirement of a second round of public consultation for new standards is included in the SSP.

Approval and Publication

The SSP does not include a separate chapter for standard approval and publication and does not place detailed requirements on publication of the standards. This resulted in the following non-conformities against the PEFC ST 1001:2017:

- **Minor non-conformity:** Benchmark 7.2.2. The SSP lacks requirements for information that the benchmark requires to be included in the standards (sub-requirements a, b, d).
- **Minor non-conformity:** Benchmark 7.2.3. The SSP does not require making the standard available in printed copies, while such requirement is stipulated by the benchmark.

Periodic Review of Standards

The SSP does not include a separate chapter for periodic review of standards. However, the general emphasis of the SSP is in standard review and revision procedures (as opposed to creating a new standard), since this is currently more relevant to the ATFS.

The assessment identified the following non-conformities:

- **Minor non-conformity:** Benchmark 8.2.1. The benchmark requires that the standardising body shall establish and maintain a permanent mechanism for collecting and recording feedback on a standard and this mechanism shall be accessible online. The ATFS has no adequate requirements for such mechanism. The DAP cannot be considered as the type of feedback mechanism intended in the benchmark.
- **Minor non-conformity:** Benchmark 8.2.2. The benchmark requires that all feedback received through all channels, including meetings, training courses, etc. shall be recorded and considered. The feedback recording and consideration procedures stipulated by the SSP focus on the standard setting/revision process and omit any feedback received throughout the standard's life span.
- **Minor non-conformity:** Benchmarks 8.3.1 & 8.3.2. The PEFC ST 1001:2017 section 8.3 requires that a gap analysis is carried out at the start of the standard review according to specifications defined under 8.3.1 and 8.3.2. This step is not explicitly featured in the SSP.

Comment: Concerning benchmark 8.2.1, the ATFS website provides a channel for feedback concerning the standard, but it is recommended that the feedback provision aspect is made explicit on the website.

Revision of Standards

The SSP does not include a separate chapter for revision of standards. However, the general emphasis of the SSP is in standard review and revision procedures (as opposed to creating a new standard), since this is currently more relevant to the ATFS.

The assessment identified the following non-conformities:

- **Minor non-conformity:** Benchmark 9.1. The benchmark requires that the procedures for revision of standard(s)/normative document(s) shall conform to those stated in section 6 of the PEFC ST 1001:2017. However, as elaborated above, the ATFS includes non-conformities with the procedures required by benchmarks 6.1.1 e; 6.1.2; 6.3.1 a, b, c, e, f; 6.4.3; 6.4.6; 6.4.7 c; 6.5.1 b, c.
- **Minor non-conformity:** Benchmarks 9.4.1, 9.4.2 & 9.4.3. The benchmark requires that a revision shall define the application date and transition period of the revised standard(s)/normative document(s). It also sets requirements for the date and the transition period. The SSP does not set corresponding requirements.

6.3 Assessment of conformity

The assessment of the standard-setting process yielded 15 minor non-conformities at the benchmark requirement level. There were no major non-conformities.

Subject to the condition that the remaining minor non-conformities are adequately addressed within a six-month period, the standard-setting procedures **comply** with the PEFC requirements.

7. STANDARD-SETTING PROCESS

7.1 Introduction

The applied standard-setting process was assessed for conformity against the PEFC ST 1001:2017. The assessment was based on the set of supporting documents provided by the AFF that included documentation of the process (see section 4.1) as well as on any additional information that was made available to the assessor during the assessment.

A summary of the main findings is provided below, following the structure of the PEFC ST 1001:2017. The checklist is included in Annex 1 (PEFC Checklist - Standard Setting Procedures and Process, p. 45).

7.2 Findings of the assessment

Standardizing Body

The ATFS standard-setting process was found to be in line with the requirements of this chapter of the PEFC ST 1001:2017. The processes concerning handling of complaints and appeals could not be assessed since the AFF reported that no formal complaints or appeals had been received.

Standard-setting Process

Despite the number of non-conformities in the required procedures of the ATFS as compared to the requirements of the PEFC ST 1001:2017 under this chapter, the process itself was found to have been largely in line with the benchmark requirements. The assessment of the process identified one non-conformity:

- **Minor non-conformity:** Benchmark 6.5.1 g. There is no documentation that outcomes of considering issues raised in the public feedback would have been compiled, made public and sent to each stakeholder/party that gave feedback as required by the benchmark.

Approval and Publication

The SSP does not include a separate chapter for standard approval and publication and does not place detailed requirements on publication of the standards. The assessment identified two non-conformities in the process against the requirements of the PEFC ST 1001:2017:

- **Minor non-conformity:** Benchmark 7.2.2 b. The official language of the standards is not explicitly defined in the standards as required, though the context of the standards practically establishes English as their official language.
- **Minor non-conformity:** Benchmark 7.2.4. Not all files/documents that comprise the ATFS development report as defined by the PEFC GD 1007 have been made publicly available as required by the benchmark.

Periodic Review of Standards

The SSP does not include a separate chapter for periodic review of standards. However, the general emphasis of the SSP is in standard review and revision procedures (as opposed to creating a new standard), since this is currently more relevant to the ATFS. The assessment identified one non-conformity in the process against the requirements of the PEFC ST 1001:2017:

- **Minor non-conformity:** Benchmark 8.2.2. The benchmark requires that all feedback received through all channels, including meetings, training courses, etc. shall be recorded and considered. It remains unclear how feedback received outside of the specific public consultation periods is addressed within the ATFS.

Comment: Concerning benchmark 8.2.1, the ATFS website provides a channel for feedback concerning the standard, but it is recommended that the feedback provision aspect is made explicit on the website.

Revision of Standards

The SSP does not include a separate chapter for revision of standards. However, the general emphasis of the SSP is in standard review and revision procedures (as opposed to creating a new standard), since this is currently more relevant to the ATFS. The assessment identified one non-conformity:

- **Minor non-conformity:** Benchmark 9.1. The benchmark requires that the process for revision of standard(s)/normative document(s) shall conform to that stated in section 6 of the PEFC ST 1001:2017. However, as elaborated above, the ATFS includes non-conformity with the process required by benchmark 6.5.1 g.

7.3 Assessment of conformity

The assessment identified 5 minor non-conformities in the standard-setting process; notably less than in the standard-setting procedures. This indicates that the implemented process was largely in line with the PEFC requirements despite the shortcomings in the written ATFS procedures. There were no major non-conformities.

Subject to the condition that the remaining minor non-conformities are adequately addressed within a six-month period, the standard-setting process **complies** with the PEFC requirements.

8. FOREST MANAGEMENT STANDARD

8.1 Introduction

The ATFS requirements for sustainable forest management are covered in the following document that is the equivalent for the PEFC ST 1003:2018:

- American Forest Foundation (AFF) 2021 Standards of Sustainability V 2.0, June 22, 2022 (hereafter “SS”)⁷

In addition to the SS, the following normative ATFS documents include contents relevant for the assessment of conformity of the ATFS sustainable forest management requirements against the PEFC ST 1003:2018:

- American Tree Farm System® Eligibility Requirements and Guidance for Certification V2.0, June 22, 2022 (hereafter “ERGC”)⁷
- American Tree Farm System 2021 Independently Managed Group (IMG) Certification Standards, March 10, 2022 (hereafter “IMG”)
- AFF Dispute and Appeals Procedures, May 20, 2021 (hereafter “DAP”)

A set of descriptive documents and other documents (see section 4.1) were also used to support the conformity assessment.

The first version of the ATFS sustainable forest management standard addressed in this assessment was titled AFF 2021 Standards of Sustainability and dated November 10, 2020. It was assessed against the PEFC ST 1003:2018 in the latter half of 2021. This assessment, documented in our draft report issued on October 21, 2021, resulted in 47 non-conformities and a conclusion that the ATFS standards for sustainable forest management do not comply with the PEFC requirements. This led to an interruption of the assessment process through a mutual decision of the AFF and the PEFC International, until a new version of the SS with suffix V 2.0 was issued by the AFF among other revised ATFS documents on March 10, 2022.

An initial assessment of the sustainable forest management standard based on the revised documents of March 10, 2022, revealed that the standard involved remaining non-conformities related to the topics of afforestation of ecologically important non-forest ecosystems, internal audit, and management review. Consequently, the assessment process was delayed one more time until revised drafts of the SS and the ERGC were submitted by the AFF to the assessor on June 22, 2022, with revised contents addressing the aforementioned topics. These two documents still lack the final approval by the standardizing body due to schedule constraints at the date of this final draft report. Consequently, the assessment conclusions based on the revised contents featured in these two draft documents are subject to their final approval by the standardizing body.

The SS consists of a prologue that provides background and guidance on how to apply the Standards, which is followed by eight thematic Standards issuing both binding and non-binding guidelines on sustainable forest management. Moving from general to specific, each Standard incorporates at least one performance measure that incorporates at least one indicator for evaluation of performance against the Standard.

The SS and the additional documents were assessed against the PEFC ST 1003:2018. A summary of the main findings is provided below, following the structure of the PEFC ST 1003:2018.

The PEFC ST 1003:2018 places various management requirements on “the organisation”, referring to the certificate holder. The ATFS includes three different certification options for landowners, in which the certificate holder is either an organisation (State Tree Farm Programs and IMGs) or the individual landowner directly (individual third-party certificates). Since State Tree Farm Programs are outside the scope of this assessment, the conformity assessment

⁷ This document version is a draft with the final approval by the standardizing body pending.

requires consideration of the remaining two options, in which the organisation is either an individual landowner or an IMG.

The SS operates on the level of an individual landowner and does not consider responsibilities of IMGs as the potential certificate holders. The latter is mainly addressed in the ATFS IMG Standard. The PEFC ST 1002:2018 and the PEFC ST 1003:2018 include sections that are analogous, and in these cases, reference is made in the text below to the corresponding section in the *ATFS PEFC Checklist Group Forest Management* that covers the conformity assessment concerning IMGs.

The checklist is included in Annex 1 (PEFC Checklist - Sustainable Forest Management, p. 95).

8.2 Findings of the assessment

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

Within the scope of this assessment, the organisation applying the ATFS may be either an individual certificate holder or an IMG.

The ATFS does not contain a PEFC chain of custody component. Therefore, assessment of conformity concerning the PEFC ST 1003:2018 requirements on chain of custody under this section is not applicable.

The assessment identified the following non-conformities:

- **Minor non-conformity:** Benchmark 4.1 i. When requirements of the benchmark standard are not reflected in the national standard because they are already addressed through legislation, the benchmark requires that an overview of applicable legislation is provided. There are shortcomings in providing reference to applicable legislation in relation to benchmarks 6.3.1.3, 6.3.2.1, 6.3.2.2, 6.3.4.3, and 8.1.4.
- **Minor non-conformity:** Benchmark 4.2. The SS places no requirements on individual certificate holders to determine the affected stakeholders or their relevant needs and expectations (sub-requirements a & b).

Concerning the minor non-conformity related to benchmark 4.1 i, it is understood that for a national-level standard that covers numerous states like the ATFS, listing all applicable state-level legislation is hardly feasible. However, some reference should be provided as an indication that each concerned issue is addressed by a specified piece of applicable legislation, e.g., on the federal level.

Leadership

This brief chapter of the PEFC ST 1003:2018 mainly concerns commitment of the organisation to the standard. The corresponding ATFS requirements are mainly in the SS prologue and its Standard 1 *Commitment to Practicing Sustainable Forestry*, as well as in the ERGC. No non-conformities were identified with regards to this chapter.

Planning

The SS does not have a separate section for planning. The performance measures and indicators of Standard 1 of the SS are directly related to this PEFC ST 1003:2018 chapter, while additional related contents are under Standards 2 and 8.

The assessment identified the following non-conformities:

- **Minor non-conformity:** Benchmark 6.3.1.2. The PEFC ST 1003:2018 requires organisations to comply with relevant international legislation, but the SS makes no reference to this.

- **Minor non-conformity:** Benchmark 6.3.1.3. Reference needs to be made to relevant U.S. anti-corruption legislation as per the requirement of benchmark 4.1 i.
- **Minor non-conformity:** Benchmarks 6.3.2.1 & 6.3.2.2. It is not described clearly how customary and traditional rights related to the forest land are clarified, recognised and respected in the context of the ATFS. If relying on U.S. legislation, reference needs to be made to relevant legislation defining and protecting property rights, including customary and traditional rights, as per the requirement of benchmark 4.1 i.
- **Minor non-conformity:** Benchmark 6.3.4.3. Reference needs to be made to relevant legislation as per the requirement of benchmark 4.1 i.

Support

Relevant contents to address the requirements of the chapter *Support* of the PEFC ST 1003:2018 are scattered under multiple Standards of the SS, with additional related contents provided in the ERGC and the DAP. One non-conformity was identified under this chapter:

- **Minor non-conformity:** Benchmark 7.4.1. The benchmark requires that appropriate mechanisms are in place for resolving complaints and disputes specifically relating to the following topics: forest management operations, land use rights and work conditions. The ATFS operates a dispute resolution mechanism guided by the DAP, but the topics defined by the benchmark are outside of its scope, as is the level at which the disputes are dealt with. The benchmark concerns the certificate holder level whereas the DAP concerns the system level.

Operation

The eight Standards of the SS have direct thematic analogies with the six criteria that comprise the chapter *Operation* of the PEFC ST 1003:2018. Nevertheless, due to the different structure between the two documents, conformity assessment against individual benchmarks mostly requires consideration of requirements set under multiple different Standards of the SS.

The assessment identified the following non-conformities:

- **Minor non-conformity:** Benchmark 8.1.3. The SS does not place a requirement of climate positive practices to management operations, and it has not been shown that this aspect is sufficiently covered in the state-level best management practices (BMPs).
- **Minor non-conformity:** Benchmark 8.1.4. Forest conversion is not directly addressed in the SS (including the exceptions listed in the benchmark sub-requirements a–e), though conversion of the forest to another use would disqualify the property from ATFS eligibility and the property would be decertified. Currently the ATFS relies largely on legislation on the matters related to forest conversion. Reference needs to be made to relevant legislation as per the requirement of benchmark 4.1 i, including the legal definition of forest land.
- **Minor non-conformity:** Benchmark 8.1.5. The SS prohibits any afforestation activities that negatively impact ecologically important non-forest areas. However, it lacks a comprehensive definition for negative impacts and has no consideration of the PEFC ST 1003:2018 exceptions related to the afforestation restriction (sub-requirements a–f).
- **Minor non-conformity:** Benchmark 8.1.6. The ATFS does not include a description of a stakeholder consultation process, an assessment of causes of forest degradation, or assessment of forest recovery status associated with conversion of degraded forests to forest plantations (sub-requirements b, g, h).
- **Minor non-conformity:** Benchmark 8.2.7. The SS does not explicitly meet the benchmark requirement on pesticide use documentation.

- **Minor non-conformity:** Benchmark 8.4.5. The SS does not explicitly meet the benchmark requirement on only using such introduced species whose impacts on the ecosystem and on the genetic integrity of native species and local provenances have been scientifically evaluated. Instead, the SS relies on a landowner's voluntary consultation with a qualified professional on the matter.

Comment: Concerning the benchmark 8.1.4, it is recommended that the SS is revised to accommodate standards for forest conversion in order to be explicitly in line with the PEFC ST 1003:2018 requirements.

The SS section concerning afforestation of ecologically important non-forest areas is based on a revised standard text only featured in the draft SS of June 22, 2022. Thus, the respective assessment conclusions against the PEFC ST 1003:2018 section 8.1.5 are dependable on the final approval of the draft SS.

Performance evaluation

The performance evaluation as per the PEFC ST 1003:2018 consists of three different components. Their scope, as interpreted by the assessor, is as follows:

- *Monitoring, measurement, analysis and evaluation* (section 9.1 of the PEFC ST 1003:2018). A continuous internal process for monitoring performance with regards to the sustainable forest management standard.
- *Internal audit* (section 9.2 of the PEFC ST 1003:2018). Carried out periodically, as opposite to continuous, but initiated and managed internally. Audit is by definition undertaken by individuals independent of the process.
- *Management review* (section 9.3 of the PEFC ST 1003:2018). An annual process for monitoring performance with regards to the whole management system of the certificate holder. Utilises findings from the two former components and seeks continual improvement.

The SS does not include a separate section addressing performance evaluation. Instead, each Standard under the SS has its respective performance measures, which have their respective indicators, for evaluating performance against the Standard. These were assessed against the benchmark requirements concerning monitoring, measurement, analysis and evaluation. The SS does not cover the topics of internal audit or management review; instead, the internal audit and management review are addressed in the ERGC concerning individual certificate holders and in the IMG concerning the group certificate holders.

The assessment yielded the following non-conformities:

- **Minor non-conformity:** Benchmark 9.2.1. The ATFS requirements for the internal audit concerning individual certificate holders omit inspection of conformity with their defined management systems, including assessment on whether it is effectively implemented and maintained (sub-requirements a & b).

The ERGC sections concerning the internal audit and management review are only featured in the draft ERGC of June 22, 2022, as new additions. Thus, the respective assessment conclusions (against the PEFC ST 1003:2018 sections 9.2 and 9.3) are dependable on the final approval of the draft ERGC.

Improvement

The aspect of improvement is not featured in the SS in the context intended by the PEFC ST 1003:2018. The aspect is covered for group certificates in the IMG. The assessor used the AFF description of the processes and documentation by a Certification Body to support the assessment. The assessment identified the following non-conformities:

- **Minor non-conformity:** Benchmark 10.1.1. While the ATFS incorporates a process of identifying and addressing nonconformities, there are no requirements for individual

certificate holders to evaluate the need for action to eliminate the causes of the non-conformity or implement any action as a response to the evaluation, including changes to the management system if necessary (sub-requirements b, c, e).

8.3 Assessment of conformity

Conformity assessment of the ATFS sustainable forest management requirements yielded 15 minor non-conformities at the benchmark requirement level.

Subject to the condition that the remaining minor non-conformities are adequately addressed within a six-month period, the sustainable forest management standard **complies** with the PEFC requirements.

9. GROUP CERTIFICATION MODEL

9.1 Introduction

The ATFS includes three different certification options for forest owners: certification through the State Tree Farm Program, the Independently Managed Group programs and the Individual Third-party Certificates. The first and second options are group certificates.

The ATFS does not include normative standards on management of the group certificates under the STFPs. The *ATFS Independently Managed Group (IMG) Certification Standards 2021* provides requirement for the Independently Managed Group programs but specifically notes that this standard (i.e., the IMG) is not applicable on the State Tree Farm Programmes. Therefore, the group certificates under the STFPs are not covered by this endorsement assessment and consequently not covered in this report. There are 11.3 million acres of forests certified by the ATFS under the STFPs. It was not possible, during this assessment, to conclude on mechanisms whereby the AFF secures that wood from forest certified under the STFPs is not sold under the PEFC logo.

The requirement for the group certificate for the Independently Managed Group programs were mainly outlined in the *American Tree Farm System (ATFS) Independently Managed Group (IMG) Certification Standards 2021*. Additional requirements were included in *ATFS Eligibility Requirements and Guidance for Certification* and *AFF Disputes and Appeals Procedures*. The conformity assessment against PEFC ST 1002:2018 resulted in a total of 62 non-conformities and a conclusion that the ATFS standard for group forest management does not comply with the PEFC requirements. The AFF and PEFC International mutually decided to interrupt the assessment process to allow for updating relevant standards of the ATFS, including the standard on group certification. The updated ATFS standard on group certification, the *2021 Independently Managed Group (IMG) Certification Standards V2.0* was submitted for assessment on 29th of March 2022.

The ATFS document, the *2021 Independently Managed Group (IMG) Certification Standards V2.0* (hereafter the IMG) is assessed against the PEFC 1002:2018. A summary of the main findings is provided below. The checklist is in Annex 1 (Checklist: Group Forest Management Certification, p. 167).

9.2 Findings of the Assessment

Context of the group organisation

The IMG group organisation structure includes Group Entity, Group Manager, Group Member⁸ and Group Organisation. Their internal relationship is well defined, mainly in chapter 3, *Terms and Definitions*, and Chapter 4, *Group Organization Structure*, of the IMG. Requirements on the Group Management System are outlined in the IMG.

Leadership

The main institution to provide leadership is the Group Entity. Leadership aspects are outlined mainly in the chapter 4 of the IMG, *Group Organization Structure*. Functions and responsibilities of the Group Entity and the Group Members are defined as well as requirements on their commitment to comply with ATFS standards.

- **Minor non-conformity:** Benchmark 5.1.2 a. PEFC ST 1002:2018 defines that group participants excluded from any certification group cannot apply for group membership within 12 months after exclusion, while IMG talks about re-admittance, which implies restricting the exclusion only to the IMG from which the group member was excluded. Hence the requirement in the IMG is narrower than the PEFC ST 1002:2018.

⁸ The Group Member is equivalent to “participant” in the PEFC ST 1002:2018.

Planning

The IMG requires a planning framework that is in line with the PEFC ST 1002:2018 and includes clear requirement with regards to a group management plan.

Support

Requirement on the Group Management system, including resources and competence, are outlined in a separate chapter, *Group Management System*. Communication processes, requirements on documented information and dispute resolution mechanisms are included in the IMG.

Operation

The IMG include a separate chapter, 5.1 *Planning and Operation*, outlining, in line with PEFC 1002:2018, how to ensure the improvements of the Group Management System as well as the processes needed to maintain the conformance with the *AFF Standards of Sustainability*.

Performance evaluation

The IMG performance evaluation include an Internal Monitoring Programme and an Internal Audit Programme. Procedures are outlined for both programmes including procedures for selection of group members and sampling in the Internal Audit Programme. An annual internal management review is required including what to include in the review and how to act on the findings.

Improvement

The IMG clearly outlines processes on how to act when non-conformities are revealed as well as roles and responsibilities within the group organisation for the actions. Requirements in line with PEFC ST 1002:2018 are included with regards to retaining of documented information and continual improvements on the group management system.

9.3 Assessment on conformity

The AFTS IMG complies with the PEFC requirements. However, this conclusion is conditional to the changing of the requirements on PEFC benchmark 5.1.2 a.

10. CERTIFICATION AND ACCREDITATION ARRANGEMENTS

10.1 ATFS requirements for certification and accreditation

The ATFS certification is applied only in the US and the national accreditation body ANSI-National Accreditation Board (ANAB) has developed an Accreditation Programme for American Tree Farm System (Accreditation Rule 27, June 30, 2020). The Standards Council of Canada (SCC) also refers to the ATFS in its accreditation programme, but the detailed rules make reference only to the SFI and Canadian CSA certification programs. ANAB is the relevant US based accreditation body in this assessment. It is a member of the International Accreditation Forum (IAF) and signatory to IAF Multilateral Agreement (MLA).

The ATFS does not have own documents defining the rules for certification and accreditation procedures. The Scheme is committed to follow ANAB Accreditation Rule 27 and consequently the PEFC Annex 6. AFF does not make any direct reference to PEFC Annex 6, but the ANAB Accreditation Rule 27 does.

ANAB Accreditation Rule includes PEFC Annex 6 and ISO 17021 standard on *Conformity assessment – Requirements for bodies providing audit and certification of management systems* as benchmark documents for accreditation services. Both standards require that certification bodies are impartial and independent from certified activities or standard setting. The ATFS does not have additional requirements to ISO 17021 standard for CBs or auditors. ISO 17021 standard requires well qualified certification and audit procedures. Adoption of PEFC Annex 6 as such ensures that the Scheme has requirements for certification and accreditation that comply with PEFC requirements.

The ANAB Accreditation Rule 27 specifies the requirements for certification bodies and certification processes. The Rule covers the individual and group certifications including the regional groups made up of state programs. This latter type of group certification is not covered by this assessment and thus it is not subject to PEFC endorsement as explained in Chapter 8 on group certification.

However, the ANAB Accreditation Rule 27 presents the competence requirements for auditors in an incoherent manner because the ANAB requirements are addressed only through the list of benchmark documents and not further explained in the Rule. This is raised as a comment (PEFC Annex 6 checklist question 2).

The ATFS does not make a reference to any scheme specific or PEFC provisions for chain of custody certification. Producers of the ATFS certified timber may apply for chain of custody certification under the SFI scheme that also is responsible for issuance of PEFC logo licenses. The provisions for chain of custody certification or issuance of PEFC labels are not covered by this assessment. However, ANAB Accreditation Rule 27 requires that certification bodies assess the compliance with PEFC logo use rules.

The ANAB Rule 27 and PEFC Annex 6 together set complying requirements for ATFS certification and accreditation procedures. Three comments were raised for further improvement of the Scheme.

Comment: ANAB Accreditation Rule 27 refers to the old version of the ATFS SFM standards (2015-2020). NOTE Regional group certification under state programs is not covered by this assessment although it is within the scope of ANAB accreditation services.

Comment: The AFF shall provide written evidence that it has adopted PEFC Annex 6 as a scheme specific rule for accreditation of certification bodies.

Comment: The ANAB requirements are addressed only through the list of benchmark documents. Substantially the ISO 17021-1 set the baseline requirement and as ANAB applies PEFC Annex 6 in ATFS certification, there is a conformance with this specific requirement of Annex 6

Detailed conformance analysis between the ATFS certification and accreditation procedures are presented in the Annex 1 to this report (Checklist: Certification and Accreditation Procedures, p. 33).

10.2 Notification of Certification Bodies

SFI is the national PEFC Governing Body in the US. Notification of certification bodies is the responsibility of the SFI Inc. as determined in Memorandum of Understanding SFI Inc and related SFI Service Agreement AFF (January 1, 2021). The AFF is also committed to follow the PEFC notification rules as defined in Annex 6 to the PEFC Technical Documentation. The service agreement is in force for a calendar year 2021 and up till now it has been renewed as appropriate.

The notification arrangements comply with the PEFC requirements.

Comment: The ATFS should describe in its own documentation the approach it has to ensure the notification of CBs. Now the issue is addressed only in the Service Agreement signed for each calendar year.

11. STAKEHOLDER VIEWS

11.1 International Consultation

An international stakeholder consultation was launched on June 15, 2021, on the website of PEFC International⁹. No comments from stakeholders were received through this process by the deadline on August 13, 2021.

11.2 National Consultation on Standard-Setting

The stakeholder consultations were carried out prior to the interruption of the assessment process. Consequently, the consultations concerned the ATFS documentation prior to the revision of the Standards and therefore not the revised documents submitted by AFF for conformity assessment on March 29, 2022.

Indufor sent questionnaires to a total of 98 stakeholders to inquire about their views on the standard-setting process and on its performance in October 2021. Altogether 15 answers were received. Their distribution by stakeholder category is shown in Table 1.

Table 1 Number of Responses Received by Stakeholder Category

#	Stakeholder category	No. of responses
1	Administration	1
2	Government Authority – State Agency	1
3	Forest and timber industry	4
	Forestry consultant	1
5	Forest owner / manager	5
6	Research institute	1
7	Environmental NGO	1
14	Member Organisation – State Tree Farm Program	1
Total		15

13 out of 15 stakeholders that provided their answers reported participating in the standard development process. The remaining two reported that they were not invited to participate, but also that their participation would have been unsure, even if they would have been invited. The participating stakeholders reported that they had received an invitation to participate in the process from the ATFS, or read about the consultation on the AFF website.

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

- General interest in forest certification.
- See to that family forestland owners' interest is taken care of in the revision process.
- See to that IMG's interest is taken care of in the revision process.
- To provide expertise to ensure long term, applicable sustainable forest management
- To provide expertise to ensure environmental sustainability in the standards while considering the operational feasibility to family forestland owners.

Out of the 15 participating stakeholders, 12 stated that in their opinion all parties relevant to standard development had been proactively identified, invited and given the possibility to participate in the standard development. Three replied I don't know. The responses included

⁹ <https://pefc.org/news/public-consultation-chinese-forest-certification-system>

comments on the good efforts by AFF on inviting a broad representation and the impressive diversity of stakeholders participating in the revision process.

All 13 stakeholders that participated in the standard development process believed the organiser had provided adequate material before the process, that the revision process had followed the procedures that were communicated with participants in advance, and that all aspects of the standard or its development process were covered (i.e., did not deserve further considerations). However, 8 of the respondents (67%) that participated in the process were not aware about any dispute settlement procedures in case of conflicting views in standard development.

All except one of the stakeholders that participated in the standard development process were not aware of any substantive or procedural complaints by stakeholders during the standard development. The stakeholder being ware of complaints did not disclose further information on the complaint.

According to the results from the questionnaire:

- The stakeholders participating in the standard formulation were given meaningful opportunity to contribute to standard formulation and to submit comments for further consideration.
- Views and comments submitted by participants were considered in an open and transparent way.
- All comments received in public consultations were discussed and addressed in an objective and transparent way.
- The requirements in the standard were agreed through consensus.

Comments provided by stakeholders through the questionnaire included:

- *This was a worthwhile exercise and really helped in understanding how in depth the certification standards are evaluated.*
- *Leigh assembled a diverse and thoughtful group. Each time we proposed a revision to standards, it was open to public comment and all comments were considered by the group. In the rare cases when we disagreed, we always found a middle ground that made everyone feel like their voice was considered.*
- *This was a very open and transparent process where all thoughts, ideas and input was considered and consensus achieved.*

Annex 1

PEFC Standard and System Requirements Checklist

PEFC Checklist (1) - Certification and Accreditation Procedures (Annex 6)

1 Scope

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

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

ATFS Reference documents:

Accreditation	ANAB Accreditation Rule 27, June 30, 2020	Normative
	ANAB's Accreditation Rule 16, July 9, 2018	Normative
	PEFC Annex 6, Certification and Accreditation Procedures, October 5, 2007	Normative in ATFS (adopted)
Notification	ATFS and SFI Service Agreement, May 2021	Normative
	PEFC Annex 6, Certification and Accreditation Procedures, October 5, 2007	Normative in ATFS (adopted)
Second party inspector training	American Tree Farm System Certifier Eligibility Requirements (undated)	Normative but NA in third party certification
Grievance procedures	Disputes and Appeals Procedures (undated)	Normative
Abbreviations:	AFF – American Forest Foundation ANAB – ANSI National Accreditation Board (USA) SCC – Standards Council of Canada SFI – Sustainable Forestry Initiative CB – certification body	



Indufor

2 Checklist

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
<p>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?</p>	<p>Annex 6, 3.1</p>	<p>Y</p> <p>The ANAB Accreditation Rule 27 (2020) describes the accreditation program for ATFS certification. ATFS is implemented only in USA, so the Canadian SCC accreditation rule is not relevant in ATFS.</p> <p>ANAB accreditation rule include PEFC Annex 6 and ISO 17021 as benchmark documents for accreditation services. Both standards require that certification bodies are impartial and independent from certified activities or standard setting.</p> <p>AFF Certification Manager reported in email on Sept 30, 2021: <i>ATFS/AFF has adopted international PEFC Certification and Accreditation Procedures. The ANAB 27 Rule established the requirements for conducting AFF Audits.</i></p> <p>The ATFS website specifies the impartiality of CBs (https://www.treefarmssystem.org/third-party-tree-farm-certification): <i>Third party certification is the auditing of a forest certification system by an outside, accredited certification body.</i></p> <p>Each American Tree Farm System Region, Independently Management Group program, and individual third-party certificate holder is required to undergo an audit by a certification body accredited by an International Accreditation Forum (IAF) member organization such as the American National Accreditation Board (ANAB) or the Standards Council of Canada (SCC). <i>Audit teams from these certification bodies will be examining on the ground conformance to the AFF Standards of Sustainability.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The ATFS and accreditation bodies require independence and impartiality of CBs</p>



Indufor

PEFC benchmark requirement		YES / NO	Reference to system documentation (including quotation of relevant text)
			Comment: AFF shall provide written evidence that it has adopted PEFC Annex 6 as a scheme specific rule for accreditation of certification bodies.
Does the scheme documentation require that certification body for forest management certification shall fulfil requirements defined in ISO 17021?	Annex 6, 3.1	Y	<p>The ANAB Accreditation Rule 27, June 30, 2020 addresses qualifications of the Certification Bodies:</p> <p>1. <i>Requirement documents: 1.9. ISO 17021-1.</i></p> <p>2. <i>Prerequisites, 2.1. The CB shall acquire and maintain ANAB accreditation for SFI as a condition of applying for ANAB accreditation for ATFS.</i></p> <p>Conclusion: Conformity</p> <p>Justification: ANAB Rules implicitly state that CBs shall comply with ISO 17021, because it is listed as one of the 11 requirement documents in section 1.</p> <p>Comment: The ANAB Rule 27 refers to old versions of the ATFS standard (2015-2020)</p> <p>ATFS documentation does not include any provisions for accreditation, nor does it clearly state that the AFF has adopted the PEFC Annex 6 for its provisions for certification and accreditation procedures, the only evidence is the email message described in PEFC requirement 1.</p> <p>The coherence of accreditation rules is not satisfactory</p>
Does the scheme documentation require that certification bodies carrying out forest certification shall have the technical competence in forest management on its economic, social and environmental impacts, and on the forest certification criteria?	Annex 6, 3.1	Y	<p>ANAB ACCREDITATION RULE 27 June 30, 2020</p> <p>1.5. PEFC Annex 6, Certification and Accreditation Procedures</p> <p>1.9. ISO/IEC 17021-1, Conformity assessment – Requirements for bodies providing audit and certification of management systems</p> <p>1.10. MA 5000, ANAB Accreditation Manual, and applicable ANAB Accreditation Rules</p> <p>1.11. IAF Mandatory Documents as applicable</p> <p>Conclusion: Conformity</p>



Indufor

PEFC benchmark requirement		YES / NO	Reference to system documentation (including quotation of relevant text)
			Justification: Requirements to comply with PEFC Annex 6 and ISO 17021 urge CBs to develop adequate technical competence.
Does the scheme documentation require that certification bodies shall have a good understanding of the national PEFC system against which they carry out forest management certification?	Annex 6, 3.1	Y	PEFC Annex 6 Certification bodies are required to have a good understanding of the national PEFC systems (ATFS) where they carry out PEFC accredited certifications. Conclusion: Conformity
Does the scheme documentation require that certification bodies have the responsibility to use competent auditors and who have adequate technical know-how on the certification process and issues related to forest management certification?	Annex 6, 3.2	Y	ANAB ACCREDITATION RULE 27, June 30, 2020 <i>1.5. PEFC Annex 6, Certification and Accreditation Procedures</i> <i>1.9. ISO/IEC 17021-1, Conformity assessment – Requirements for bodies providing audit and certification of management systems</i> Specification of education, professional training and work experience for auditors and experts. Conclusion: Conformity Justification: The ATFS / ANAB requirements on the competence of auditors are presented in an incoherent manner. ANAB requirements are addressed only through the list of requirement documents. Comment: Substantially the ISO 17021-1 set the baseline requirement and as ANAB applies PEFC Annex 6 in ATFS certification, there is a conformance with this specific requirement of Annex 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	Y	ANAB ACCREDITATION RULE 27, June 30, 2020 does not explicitly require compliance with ISO 19011 standard (Guidelines for auditing management systems). Indirectly the requirement to comply with ISO 17021 standard establish the same provision. AFF has adopted PEFC Annex 6 as the ATFS provisions for certification and accreditation bodies thus the requirement is covered by the system. Conclusion: Conformity



Indufor

PEFC benchmark requirement		YES / NO	Reference to system documentation (including quotation of relevant text)
			Justification: PEFC Annex 6 requires directly and ANAB Rule indirectly the auditors' compliance with ISO 10911 standard.
Does the scheme documentation include additional qualification requirements for auditors carrying out forest management audits? [*1]	Annex 6, 3.2	NA	<p>The ATFS does not require additional requirements for third party auditors. The requirements are stated in ANAB Accreditation Rule 27 and PEFC Annex 6</p> <p>ATFS lists in its own document <i>American Tree Farm System Certifier Eligibility Requirements (undated)</i> the specific requirements for ATFS second party inspectors that assess the compliance of forest management at individual forest estates before they can join ATFS group certification programs.</p> <p><i>The following minimum education and/or experience requirements are necessary for professionals certifying and inspecting Tree Farms.</i></p> <ul style="list-style-type: none"> • <i>All inspectors shall successfully complete the Certifier Training Program. Inspectors shall complete the refresher training every five years, which will coincide with AFF Standard revisions.</i> <p><i>All inspectors shall meet at least one of the four recognized requirements:</i></p> <ul style="list-style-type: none"> • <i>A Bachelor of Science, Forestry degree, or higher from a Society of American Foresters (SAF) accredited program.</i> • <i>Two-year forestry technician degree from an SAF recognized program.</i> • <i>Anyone already serving as a Tree Farm inspector prior to July 31, 1999 is grandfathered in as an inspector provided their names were included in a list of inspectors submitted by the State Tree Farm Chair to the American Forest Foundation by July 31, 1999 and has completed the Certifier Training Program.</i> • <i>Anyone professionally practicing forestry and meeting the following minimum educational requirements.</i> <p>Conclusion: Not applicable</p>



Indufor

PEFC benchmark requirement		YES / NO	Reference to system documentation (including quotation of relevant text)
			Justification: The ATFS specifies training and work experience requirements for inspectors in the amendment to its Inspector Workshop Registration Form. These inspectors do second party audits for AFF.
Does the scheme documentation require that certification bodies shall have established internal procedures for forest management certification?	Annex 6, 4	Y	ANAB ACCREDITATION RULE 27, June 30, 2020 CB shall conform to the requirements of <i>1.9 ISO 17021 and 1.5 PEFC Annex 6</i> . Both documents require established internal procedures. Conclusion: Conformity Justification: The PEFC and ISO standards that ATFS has adopted as Requirement Documents include the compliant requirement.
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	Y	ANAB ACCREDITATION RULE 27, June 30, 2020, SCC 2. Normative references 1.9. ISO/IEC 17021-1, Conformity assessment – Requirements for bodies providing audit and certification of management systems Conclusion: Conformity Justification: The PEFC and ISO standards that ATFS has adopted as Requirement Documents include the compliant requirement
Does the scheme documentation require that applied auditing procedures shall fulfil or be compatible with the requirements of ISO 19011?	Annex 6, 4	Y	ANAB ACCREDITATION RULE 27, June 30, 2020 - ANAB do not make direct reference to ISO 19011 standard e.g. on auditing procedures PEFC Annex 6 – <i>The applied auditing procedures shall fulfil or be compatible with the requirements of ISO 19011.</i> Conclusion: Conformity Justification: Although ANAB Rule 27 does not directly require compliance with ISO 19011 standard, ISO 17021 standard along with PEFC Annex 6 make references to the standard.
Does the scheme documentation require that certification body shall inform the relevant	Annex 6, 4	Y	ANAB ACCREDITATION RULE 27, June 30, 2020



Indufor

PEFC benchmark requirement		YES / NO	Reference to system documentation (including quotation of relevant text)
PEFC National Governing Body about all issued forest management certificates and changes concerning the validity and scope of these certificates?			<p>7.3. <i>Certification Body Information Sharing and Transfer to ATFS and PEFC: The CB shall inform AFF (the ATFS governing body) and SFI Inc. (the PEFC National Governing Body for the United States) about all issued certificates and the validity and scope of these certificates. The CB shall inform the client organization about information provided to AFF and SFI Inc.</i></p> <p>PEFC Annex 6, Ch 4 sets the respective requirement.</p> <p>Conclusion: Conformity</p> <p>Justification: Through the provisions of ANAB Rule 27 and PEFC Annex 6, the ATFS has a complying requirement.</p>
Does the scheme documentation require that certification body shall carry out controls of PEFC logo usage if the certified entity is a PEFC logo user?	Annex 6, 4	Y	<p>ANAB ACCREDITATION RULE 27, June 30, 2020</p> <p>7.4. <i>Assessment of ATFS and PEFC Logo Usage Compliance: The CB will ensure appropriate control of the PEFC and/or ATFS logo if the certified entity is a PEFC and/or ATFS logo user.</i></p> <p>PEFC Annex 6 sets the respective requirement.</p> <p>Conclusion: Conformity</p> <p>Justification: ANAB Rule and PEFC Annex 6 require the control of logo use</p> <p>Comment: ATFS does not have provisions for chain of custody or issuance of PEFC logos. The National Governing Body SFI is responsible for these activities. Issuance and use of ATFS logo are not covered by this assessment.</p>
Does a maximum period for surveillance audits defined by the scheme documentation not exceed more than one year?	Annex 6, 4	Y	<p>ANAB ACCREDITATION RULE 27, June 30, 2020</p> <p><i>Requirement documents (current version unless specified) 1.1 AFF 2015-2020 standards for sustainability for Forest Certification.</i></p> <p>5. <i>Surveillance Assessment</i></p> <p>5.1. <i>ANAB shall conduct an annual office assessment and witness a CB team conducting an ATFS audit for each type of group certified (that is, Regional</i></p>



Indufor

PEFC benchmark requirement		YES / NO	Reference to system documentation (including quotation of relevant text)
			<p>Group and/or Independent Managed Group) at least once in each accreditation cycle.</p> <p>5.1.1. When possible, the office assessment shall be conducted concurrently with assessments for SFI and other ANAB accreditation programs for which the CB is accredited.</p> <p>5.1.2. The witnessed audits required during the accreditation cycle are for both regional groups and independent managed groups; however, if the CB has not certified any clients in one type of group, ANAB shall conduct one witnessed audit in the cycle for the type of group for which the CB has certification activity.</p> <p>SCC: 2. Normative reference: ISO 17021 (which requires regular surveillance audits)</p> <p>Conclusion: Conformity</p> <p>Justification: ANAB Accreditation Rule and PEFC Annex 6 require annual audits</p> <p>Comment: ANAB Accreditation Rule 27 refers to the old version of ATFS SFM standards (2015-2020). NOTE Regional group certification is not covered by this assessment.</p>
Does a maximum period for assessment audit not exceed five years for forest management certifications?	Annex 6, 4	Y	<p>ANAB ACCREDITATION RULE 27, June 30, 2020</p> <p>6. Reaccreditation Assessments</p> <p>6.1. ANAB shall conduct a document review and on-site full system office assessment at approximately six months prior to the expiration of accreditation.</p> <p>8. Additional ATFS Requirements</p> <p>8.2. ATFS certification cycles may be up to five years.</p> <p>PEFC Annex 6 sets the respective requirement</p> <p>Conclusion: Conformity</p> <p>Justification: ATFS provision for accreditation comply with the PEFC requirements.</p>



Indufor

PEFC benchmark requirement		YES / NO	Reference to system documentation (including quotation of relevant text)
Does the scheme documentation include requirements for public availability of certification report summaries?	Annex 6, 4	Y	<p>ANAB ACCREDITATION RULE 27, June 30, 2020</p> <p><i>7. Criteria for Certification Process</i></p> <p><i>7.2. Public Access of Certification Reports: A summary of the certification report, including a summary of findings on the auditee's conformity with the forest management standard, shall be made available to the public by the auditee or in accordance with any applicable requirements defined by the respective forest certification scheme.</i></p> <p>PEFC Annex 6 also sets the respective requirement</p> <p>Conclusion: Conformity</p> <p>Justification: ATFS provision for accreditation comply with the PEFC requirements.</p>
Does the scheme documentation include requirements for usage of information from external parties as the audit evidence?	Annex 6, 4	Y	<p>ANAB ACCREDITATION RULE 27, June 30, 2020</p> <p><i>7.1. Public Consultation: The audit evidence to determine the conformity with the forest management standard shall include relevant information from external parties (for example, governmental agencies, community groups, and conservation organizations) as appropriate.</i></p> <p>PEFC Annex 6 sets the respective requirement</p> <p>Conclusion: Conformity</p> <p>Justification: ANAB Rule and PEFC Annex 6 require consultation of external parties.</p>
Does the scheme documentation include additional requirements for certification procedures? ^[*1]	Annex 6, 4	Y	<p>ANAB ACCREDITATION RULE 27, June 30, 2020</p> <p><i>8. Additional ATFS Requirements (not documented elsewhere)</i></p> <p><i>8.1. ATFS audit time</i></p> <p><i>8.1.1. The CB shall have a process to determine ATFS audit time.</i></p> <p><i>8.1.2. ANAB shall review the CB's audit-time process during the application process and refer to it throughout the oversight of the ATFS program.</i></p>



Indufor

PEFC benchmark requirement		YES / NO	Reference to system documentation (including quotation of relevant text)
			<p>8.2. ATFS certification cycles may be up to five years.</p> <p>Conclusion: Conformity</p> <p>Justification: ANAB has some additional procedural requirements.</p>
Does the scheme documentation require that certification bodies carrying out forest management certification shall be accredited by a national accreditation body?	Annex 6, 5	Y	<p>PEFC Annex 6, adopted by the AFF to the ATFS sets the respective requirement and require compliance with ISO 17021.</p> <p>ANAB ACCREDITATION RULE 27, June 30, 2020 defines procedures for accreditation, e.g. compliance with ISO 17021.</p> <p>Conclusion: Conformity</p> <p>Justification: ATFS requires accreditation from national Accreditation bodies through the compliance with ISO 17021 and PEFC Annex 6.</p>
Does the scheme documentation require that an accredited certificate shall bear an accreditation symbol of the relevant accreditation body?	Annex 6, 5	Y	<p>The accreditation standards require that an accredited certificate bear the accreditation symbol of the relevant accreditation bodies as evidenced in the following relevant documentation:</p> <p>ANAB's Accreditation Rule 16 applies to all ANAB-Accredited and applicant certification bodies and refers to ISO 17021-1:</p> <p><i>8.2.2 The certification document(s) shall identify the following:</i></p> <p><i>g) the name, address and certification mark of the certification body; other marks (e.g. accreditation symbol, client's logo) may be used provided they are not misleading or ambiguous.</i></p> <p>PEFC Annex 6 sets the respective requirement</p> <p>Conclusion: Conformity</p> <p>Justification: Accreditation rules and PEFC Annex 6 require that a certificate has the symbol on accredited certification.</p>
Does the scheme documentation require that the accreditation shall be issued by an accreditation body which is a part of the International Accreditation Forum (IAF)	Annex 6, 5	Y	<p>PEFC Annex 6 sets the respective requirement</p> <p>ANAB ACCREDITATION RULE 27, June 30, 2020</p> <p>1. Requirement Documents</p>



Indufor

PEFC benchmark requirement		YES / NO	Reference to system documentation (including quotation of relevant text)
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?			<p>1.11. IAF Mandatory Documents as applicable</p> <p>Conclusion: Conformity</p> <p>Justification: ANAB and SCC recognized members of IAF and thus respect the IAF procedures.</p>
Does the scheme documentation require that certification body undertake forest management certification as "accredited certification" based on ISO 17021 and the relevant forest management standard(s) shall be covered by the accreditation scope?	Annex 6, 5	Y	<p>ANAB ACCREDITATION RULE 27, June 30, 2020</p> <p>1. Requirement Documents</p> <p>1.9. ISO/IEC 17021-1, Conformity assessment – Requirements for bodies providing audit and certification of management systems</p> <p>PEFC Annex 6 set the respective requirement</p> <p>Conclusion: Conformity</p> <p>Justification: ANAB and PEFC Annex 6 set the complying requirement</p>
Does the scheme documentation include a mechanism for PEFC notification of certification bodies?	Annex 6, 6	Y	<p>PEFC Annex 6, <i>Certification and Accreditation Procedures</i> – set the respective requirement</p> <p>2021 Service Agreement SFI ATFS 05.05.21 Annex II</p> <p>PEFC CB Notification</p> <p>SFI will:</p> <ul style="list-style-type: none"> • maintain a current list of accredited: <ul style="list-style-type: none"> a. Certification Bodies (SFM Standards delivering certification audits to the SFI Forest Management Standard, <u>the American Tree Farm Standard</u>, and the Small Lands Group Certification Module) and ... • enter the list and any appropriate revisions to the PEFC International database. • create, revise, and update the notification contract between PEFC US and certification bodies delivering Forest Management and PEFC Chain of Custody audits, and send it to the relevant certification bodies. • communicate with Certification Bodies on notification contracts, current certifications, contact information, interpretations, etc.



Indufor

PEFC benchmark requirement		YES / NO	Reference to system documentation (including quotation of relevant text)
			<ul style="list-style-type: none"> • <i>collect proof of accreditation for forest management and chain of custody certification bodies.</i> <p>Conclusion: Conformity</p> <p>Justification: Through the Service Agreement between SFI and AFF, SFI is responsible for notification of ATFS certification bodies. The service agreement is in force for a calendar year 2021 and up till now it has been renewed as appropriate.</p> <p>Comment: ATFS should describe in its own documentation the approach it has to ensure the notification of CBs.</p>
Are the procedures for PEFC notification of certification bodies non-discriminatory?	Annex 6, 6	Y	<p><i>2021 Service Agreement SFI ATFS 05.05.21 Annex II</i></p> <p>See PEFC requirement 22.</p>

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

1 Scope

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

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

ATFS reference documents:

Document type	Document name
Normative documents	Standard Setting Procedures, November 11, 2019 (hereafter “SSP”) AFF Dispute and Appeals Procedures, May 20, 2021 (hereafter “DAP”) American Tree Farm System 2021 Independently Managed Group (IMG) Certification Standards, March 10, 2022 (hereafter “IMG”)
Other documents	5 Cert Com Standards Setting Procedures Memo FINAL.pdf AFF PEFC Gap 090619.xlsx ATFS Alert Announcing Intent To Revise AFF Standards.pdf Consensus Release 091420 [11 files] Consensus Release 091420.doc ISRP Conference Call Notes 1.6.20 (1).docx ISRP WebEx Notes [9 files] Public Comment Period #1 – Summary.docx Public Comment Period #2 - consideration and actions of ISRP.xlsx Stakeholder Mapping 2021 ISRP.xlsx Standards Revision Memo from NSIC ISRP to Board.docx Survey response Standard Setting Procedure 092319.docx



Indufor

2 Checklist

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
Standardising Body			
5.1.1 The standardising body shall have written procedures for standard-setting activities describing:			
(a) its legal status and organisational structure, including a body responsible for consensus-building (working group, refer to 6.4) and procedures for formal adoption of the standard (refer to 7.1),	Procedures	Y	<p>The SSP contains written procedures for formal adoption of the standards and description of the organisational structure. The SSP states: <i>The American Forest Foundation, a 501c.3, not-for-profit, organization located at 2000 M Street NW, Washington, DC is the sole proprietor and has sole responsibility for setting its "Standards of Sustainability for Forest Certification."</i> It furthermore states: <i>The AFF Board of Directors (Board of Trustees), will ... initiate a standard review process. The Board of Trustees will convene an Independent Standard Review Panel (ISRP).</i> The ISRP applies a consensus-based approach according to the SSP and constitutes the working group intended in the PEFC ST 1001:2017 benchmark.</p> <p>Conclusion: Conformity</p> <p>Justification: The SSP is in line with the PEFC ST 1001:2017.</p>
(b) procedures for keeping documented information,	Procedures	Y	<p>SSP Chapter 7: <i>Records and Documentation. 7.1) All records, minutes, communications and other pertinent and tangible evidence of the Standard revision/modification process will be maintained by AFF or its agents or assignees until the completion of the next review or revision of the standard or a minimum of 5 years after publication of the standard.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SSP is in line with the PEFC ST 1001:2017.</p>



Indufor

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
(c) procedures for balanced representation of stakeholders,	Procedures	Y	Conclusion: Conformity Justification: SSP Chapter 3: <i>Balanced Representation and Decision Making</i> describes the procedures aimed for acquiring a balanced representation of stakeholders. It states e.g.: <i>The ISRP will have a balance of appropriate interests and be constituted in such a manner that no single category of the interest representation can dominate decision making procedures of the group.</i>
(d) the standard-setting process,	Procedures	Y	Conclusion: Conformity Justification: The standard-setting process is described in the SSP.
(e) the mechanism for reaching consensus, and	Procedures	Y	Conclusion: Conformity Justification: SSP Chapter 3: <i>Balanced Representation and Decision Making</i> , section 3.4 lists in detail the alternative processes to reach consensus, i.e. processes to establish whether there is opposition to the standard and, in case of sustained opposition related to a substantive issue, processes to reach resolution.
(f) review and revision of standard(s)/normative document(s).	Procedures	Y	Conclusion: Conformity Justification: The SSP generally applies to review and revision of the standards.
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	N	SSP, Acknowledgment: <i>The Standard Setting Procedures are publicly available at the AFF website and upon request.</i> SSP Chapter 1: <i>Standard Setting Principles. ... 1.3) AFF will see continual improvement of the standard and undergo periodic review. 1.4) AFF will make all</i>



Indufor

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p><i>relevant documents publicly available for interested parties to follow the developments during and after the process.</i></p> <p>SSP Chapter 2: <i>Convening the Standard Setting/Review Forum. 2.1) The AFF Board of Directors (Board of Trustees), will, at its discretion, but not exceeding a five-year period from the approval of the last standard revision, initiate a standard review process. ...</i></p> <p>Conclusion: Minor non-conformity</p> <p>Justification: The SSP only addresses review of the standard itself and not review of the standard-setting procedures.</p>
	Process	Y	<p>Conclusion: Conformity</p> <p>Justification: Feedback for revision of the standard-setting procedures was requested from stakeholders e.g. in an e-mail announcing the standard revision process, circulated through an ATFS e-mail list on August 22, 2019 (see <i>ATFS Alert Announcing Intent To Revise AFF Standards.pdf</i>).</p> <p>The SSP states that <i>these procedures were approved by the AFF Board of Trustees on November 11, 2019 with the Board approved definition of consensus.</i></p> <p>The SSP is publicly available at the AFF website: https://www.treefarmssystem.org/stuff/contentmgr/files/2/4d57ff904f6c30951f4c3aab4d36455c/misc/aff_standard_setting_procedures_final.pdf </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:			



Indufor

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
(a) Standard-setting procedures,	Procedures	Y	<p>SSP Chapter 7: <i>Records and Documentation</i>. 7.1) <i>All records, minutes, communications and other pertinent and tangible evidence of the Standard revision/modification process will be maintained by AFF or its agents or assignees until the completion of the next review or revision of the standard or a minimum of 5 years after publication of the standard.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SSP is in line with the PEFC ST 1001:2017.</p>
	Process	Y	<p>Conclusion: Conformity</p> <p>Justification: The standard-setting procedures were made available online on the ATFS website (https://www.treefarmssystem.org/standards-process-overview).</p>
(b) Stakeholder identification mapping,	Procedures	Y	<p>SSP Chapter 3: <i>Balanced Representation and Decision Making</i>. ... <i>A stakeholder analysis will identify key groups, including disadvantaged stakeholder groups, and will be considered for the ISRP process.</i></p> <p>Conclusion: Conformity</p> <p>Justification: SSP Chapter 3 requires a stakeholder analysis to be conducted and Chapter 7 necessitates that documents encompassing the stakeholder analysis are maintained under the management of the AFF.</p>
	Process	Y	<p>Conclusion: Conformity</p> <p>Justification: <i>Stakeholder Mapping 2021 ISRP.xlsx</i> includes documentation of the stakeholder identification mapping.</p>



Indufor

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
(c) Contacted and/or invited stakeholders,	Procedures	Y	Conclusion: Conformity Justification: SSP Chapter 7 requires that all communications related to the standard revision/modification process are thoroughly documented and documents maintained under the management of the AFF.
	Process	Y	Conclusion: Conformity Justification: <i>Stakeholder Mapping 2021 ISRP.xlsx</i> includes documentation of the stakeholder identification mapping and the final stakeholder composition of ISRP.
(d) Stakeholders involved in standard-setting activities including participants in each working group meeting,	Procedures	Y	Conclusion: Conformity Justification: SSP Chapter 7 requires all steps of the standard revision/modification process to be thoroughly documented and documents maintained under the management of the AFF. This involves records from stakeholders involved in standard-setting activities and participants in each ISRP meeting.
	Process	Y	Conclusion: Conformity Justification: Stakeholder participants in ISRP meetings were documented in the minutes of each meeting (<i>ISRP WebEx Notes</i> files).
(e) Feedback received and a synopsis of how feedback was addressed,	Procedures	Y	SSP Chapter 4: <i>Meetings, Comments and Consultation. ... 4.5) Any presented comments or views of the ISRP members as well as their representative organization or other interested parties shall be reviewed and considered in an open and transparent manner. The comments, responses and respective</i>



Indufor

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p><i>modifications to the Standard shall be recorded and made available to all members of the ISRP and the Commenter's respective organization(s).</i></p> <p>SSP Chapter 5: <i>Public Review and Comment on Proposed Standard. ... 5.6) The comments, responses to received comments and relevant modifications shall be made available to Commenters and public upon request of from AFF's website.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SSP is in line with the PEFC ST 1001:2017.</p>
	Process	Y	<p>Conclusion: Conformity</p> <p>Justification: The feedback received from public consultations to the SSP and to the draft standards, including synopsis of how feedback was addressed, was included in <i>Survey response Standard Setting Procedure 092319.docx</i>, <i>5 Cert Com Standards Setting Procedures Memo FINAL.pdf</i>, <i>Public Comment Period #1 – Summary.docx</i>, <i>Public Comment Period #2 - consideration and actions of ISRP.xlsx</i>.</p>
(f) All drafts and final versions of the standard,	Procedures	Y	<p>Conclusion: Conformity</p> <p>Justification: SSP Chapter 7 requires all steps of the standard revision/modification process to be thoroughly documented and documents maintained under the management of the AFF. This involves all drafts and final versions of the standard.</p>
	Process	Y	<p>Conclusion: Conformity</p> <p>Justification: The standards were made accessible through the ATFS website (https://www.treefarmssystem.org/view-standards).</p>



Indufor

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
(g) Outcomes from working group considerations,	Procedures	Y	Conclusion: Conformity Justification: SSP Chapter 7 requires all steps of the standard revision/modification process to be thoroughly documented and documents maintained under the management of the AFF. This involves outcomes from ISRP considerations.
	Process	Y	Conclusion: Conformity Justification: Outcomes from ISRP considerations were documented in the minutes of each ISRP meeting (<i>ISRP WebEx Notes</i> files).
(h) Evidence of consensus on the final version of the standard(s),	Procedures	Y	<i>SSP Chapter 3: Balanced Representation and Decision Making. ... ISRP shall provide evidence on consensus having been reached before the formal approval of the standard. ...</i> Conclusion: Conformity Justification: SSP Chapter 3 requires the evidence of consensus to be provided and Chapter 7 necessitates that documents encompassing this evidence are maintained under the management of the AFF.
	Process	Y	Conclusion: Conformity Justification: Signed <i>Consensus Release 091420.docx</i> forms include declarations of consensus by the ISRP members. The process for reaching consensus is documented in the ISRP meeting minutes (<i>ISRP WebEx Notes</i> files) that detail the ISRP revision process discussion.
	Procedures	Y	Conclusion: Conformity



Indufor

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
(i) Evidence relating to the review process, and			Justification: SSP Chapter 7 requires all steps of the standard revision/modification process to be thoroughly documented and documents maintained under the management of the AFF.
	Process	Y	Conclusion: Conformity Justification: The process was thoroughly documented. See e.g. the ISRP meeting minutes (<i>ISRP WebEx Notes</i> files), <i>Standards Revision Memo from NSIC ISRP to Board.docx</i> , <i>Public Comment Period #2 - consideration and actions of ISRP.xlsx</i> .
(j) Final approval by the standardising body.	Procedures	Y	Conclusion: Conformity Justification: SSP Chapter 7 requires all steps of the standard revision/modification process to be thoroughly documented and documents maintained under the management of the AFF. This involves the final approval by the standardising body.
	Process	Y	Conclusion: Conformity Justification: Approval of the revised standards was published at the ATFS website: https://www.treefarmssystem.org/view-standards .
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	Y	SSP Chapter 7: <i>Records and Documentation</i> . 7.1) <i>All records, minutes, communications and other pertinent and tangible evidence of the Standard revision/modification process will be maintained by AFF or its agents or assignees until the completion of the next review or revision of the standard or a minimum of 5 years after publication of the standard.</i> Conclusion: Conformity



Indufor

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			Justification: The SSP is in line with the PEFC ST 1001:2017.
	Process	NA	Conclusion: NA Justification: The process can only be assessed after the period defined in the benchmark. At the time of this conformity assessment the documented information as defined in section 5.2.1 was being kept adequately.
5.2.3 Documented information shall be available to interested parties upon request.	Procedures	Y	SSP Chapter 8: <i>Openness, Transparency and Public Availability</i> . 8.1) <i>All records, minutes, communications and other pertinent and tangible evidence of the process will be made available to the public at its request.</i> Conclusion: Conformity Justification: The SSP is in line with the PEFC ST 1001:2017.
	Process	Y	Conclusion: Conformity Justification: An overview of the process and contact information for enquiries was provided in the ATFS website: https://www.treefarmssystem.org/standards-process-timeline .
5.3.1 The standardising body shall establish procedure(s) for dealing with any substantial and process complaints and appeals relating to its standard-setting activities. It must make procedure(s) accessible to stakeholders. Upon receipt of a complaint or appeal, the standardising body shall:			
(a) acknowledge receipt of the complaint or appeal to the complainant,	Procedures	Y	SSP Chapter 9: <i>Dispute Resolution and Appeals Processes</i> . 9.1) <i>All complaints, disputes or appeals relating to AFF Standard Setting can be submitted and shall be resolved according to AFF Disputes and Appeals Procedures.</i>



Indufor

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>DAP Chapter 6: <i>Complaints and appeals acceptance. ... 6.3) The President shall without delay: a) Acknowledge to the complainant / appellant (in writing) the receipt and subject of the complaint/appeal or rejection of the complaint/appeal ...</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SSP and the DAP are in line with the PEFC ST 1001:2017.</p>
	Process	NA	<p>Conclusion: NA</p> <p>Justification: No formal complaints or appeals have been received.</p>
(b) gather and verify all necessary information to validate the complaint or appeal, evaluate the subject matter of the complaint or appeal impartially and objectively, and make a decision regarding the complaint or appeal,	Procedures	Y	<p>Conclusion: Conformity</p> <p>Justification: DAP Chapter 4 and Chapter 5 state that the complainant/appellant shall submit supportive written information which can be verified as accurate and correct through an independent source. DAP Chapter 7 and Chapter 8 detail the investigation and decision-making process of the standardising body (AFF).</p>
	Process	NA	<p>Conclusion: NA</p> <p>Justification: No formal complaints or appeals have been received.</p>
(c) formally communicate the decision on the complaint or appeal to the complainant and describe the handling process.	Procedures	Y	<p>DAP Chapter 6: <i>Complaints and appeals acceptance. ... 6.3) The President shall without delay: ... b) Provide the complainant/appellant with details of AFF's complaints and appeals procedures to ensure that they are clearly understood ...</i></p> <p>DAP Chapter 7: <i>Complaint investigation and resolution process. ... 7.5) The President shall inform the complainant and other interested parties about the</i></p>



Indufor

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p><i>outcomes of the complaint resolution process in writing and sent through registered mail.</i></p> <p>DAP Chapter 8: <i>Appeal investigation and resolution process. ... 8.4) The President shall inform the complainant/appellant and other affected parties, about the outcomes of the appeal resolution process.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The DAP is in line with the PEFC ST 1001:2017.</p>
	Process	NA	<p>Conclusion: NA</p> <p>Justification: No formal complaints or appeals have been received.</p>
5.3.2 The standardising body shall establish at least one contact point for enquiries, complaints and appeals relating to its standard-setting activities. The contact point shall be easy to access and readily available.	Procedures	Y	<p>DAP Chapter 6: <i>Complaints and appeals acceptance. 6.1) All complaints and appeals shall be addressed in writing to the AFF President ...</i></p> <p>Conclusion: Conformity</p> <p>Justification: The role of the AFF President as the contact point for enquiries, complaints and appeals is established in DAP Chapter 6 and clearly reflected throughout the DAP.</p>
	Process	NA	<p>Conclusion: NA</p> <p>Justification: No formal complaints or appeals have been received.</p>
Standard-setting process			
6.1.1 For the creation of a new standard, the standardising body shall develop a proposal including:			



Indufor

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
(a) the scope of the standard,	Procedures	Y	<p>SSP Chapter 2: <i>Convening the Standard Setting/Review Forum. The AFF Board of Directors (Board of Trustees), will, at its discretion, but not exceeding a five-year period from the approval of the last standard revision, initiate a standard review process. ...</i></p> <p>Conclusion: Conformity</p> <p>Justification: As per benchmark 6.1.2, this requirement is relevant also for standard revision.</p> <p>The SSP does not explicitly feature the concept of standard proposal prior to the working group inputs. However, the default scope of the revised standard is practically determined by the previous operative version <i>2015-2020 Standards of Sustainability</i>, and any changes in the scope are expected to be a result of public feedback and the revision process by ISRP.</p>
	Process	Y	<p>Conclusion: Conformity</p> <p>Justification: The scope of the standard has been established in the previous operative version <i>2015-2020 Standards of Sustainability</i>.</p>
(b) a justification of the need for the standard,	Procedures	NA	<p>Conclusion: NA</p> <p>Justification: The AFF did not create a new standard during this process. The 2021 AFF Standards of Sustainability were revised based on the previous operative version <i>2015-2020 Standards of Sustainability</i>.</p>
	Process		
(c) a clear description of the intended outcomes	Procedures	NA	<p>Conclusion: NA</p>
	Process		



Indufor

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			Justification: The AFF did not create a new standard during this process. The 2021 AFF Standards of Sustainability were revised based on the previous operative version <i>2015-2020 Standards of Sustainability</i> .
(d) a risk assessment of potential negative impacts arising from implementing the standard, such as <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 	Procedures	NA	Conclusion: NA Justification: The AFF did not create a new standard during this process. The 2021 AFF Standards of Sustainability were revised based on the previous operative version <i>2015-2020 Standards of Sustainability</i> .
	Process		
(e) a description of the stages of standard development and their expected timetable. NOTE Guidance for development of a proposal and justification is given in ISO Directives, Part 1, Annex C and Annex SL (Appendix 1).	Procedures	N	Conclusion: Minor non-conformity Justification: As per benchmark 6.1.2, this requirement is relevant also for standard revision. The SSP does not explicitly feature the concept of standard proposal prior to working group inputs or place requirements for the contents of such proposal.
	Process	Y	Conclusion: Conformity Justification: The stages of standard development and their expected timetable were published in the AFF website in conjunction with the launching of the revision process: https://www.treefarmssystem.org/standards-process-timeline .
	Procedures	N	Conclusion: Minor non-conformity



Indufor

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
6.1.2 For the revision of a standard the proposal shall cover at least (a) and (e) of clause 6.1.1.			Justification: The non-conformity derives from the non-conformity of 6.1.1 e: Procedures.
	Process	Y	Conclusion: Conformity Justification: See 6.1.1 e: Process.
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	Y	SSP Chapter 2: <i>Convening the Standard Setting/Review Forum. ... 2.2) The Board of Trustees will invite a representative cross-section of forestry community leaders with a stake in AFF's American Tree Farm System (ATFS) Program, or a sincere interest in forest sustainability on small private forest ownerships in the US to participate on the ISRP. The Board of Trustees will have the discretion to limit the ISRP to a size respective of AFF's financial and staffing resources.</i> SSP Chapter 3: <i>Balanced Representation and Decision Making. ... 3.2) Interest categories shall include, but not necessarily be limited to: scientific and technical community, environmental non- government organizations (ENGOS), forest industry, forest owners, indigenous peoples, workers/trade unions, and public forestry agencies serving family forest owners. A stakeholder analysis will identify key groups, including disadvantaged stakeholder groups, and will be considered for the ISRP process.</i> Conclusion: Conformity Justification: The SSP is in line with the PEFC ST 1001:2017.
	Process	Y	Conclusion: Conformity Justification: The AFF carried out a stakeholder mapping exercise as detailed in the benchmark. The process is included in <i>Stakeholder Mapping 2021 ISRP.xlsx</i> .



Indufor

PEFC benchmark requirement	Assessment basis	YES /NO	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. <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 United Nations Conference on Environment and Development consists of: (i) business and industry, (ii) children and youth, (iii) forest owners, (iv) indigenous peoples, (v) local authorities, (vi) non-government organizations, (vii) scientific and technological community, (viii) women, and (ix) workers and trade unions.</p>	Procedures	Y	<p>SSP Chapter 3: <i>Balanced Representation and Decision Making</i>. ... 3.2) <i>Interest categories shall include, but not necessarily be limited to: scientific and technical community, environmental non- government organizations (ENGOS), forest industry, forest owners, indigenous peoples, workers/trade unions, and public forestry agencies serving family forest owners. A stakeholder analysis will identify key groups, including disadvantaged stakeholder groups, and will be considered for the ISRP process.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SSP is in line with the PEFC ST 1001:2017.</p>
	Process	Y	<p>Conclusion: Conformity</p> <p>Justification: The stakeholder groups defined in the benchmark were featured in the stakeholder mapping exercise, as documented in <i>Stakeholder Mapping 2021 ISRP.xlsx</i>.</p>
6.2.3 The standardising body shall identify disadvantaged stakeholders and key stakeholders and	Procedures	Y	<p>SSP Chapter 3: <i>Balanced Representation and Decision Making</i>. ... A <i>stakeholder analysis will identify key groups, including disadvantaged stakeholder groups, and will be considered for the ISRP process.</i></p>



Indufor

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
<p>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>Conclusion: Conformity</p> <p>Justification: The SSP is in line with the PEFC ST 1001:2017.</p>
	Process	Y	<p>Conclusion: Conformity</p> <p>Justification: According to the AFF, the AFF staff discussed mechanisms to involve disadvantaged stakeholders with ISRP, and ISRP and AFF staff focused on ways to attract such stakeholders. <i>ISRP Conference Call Notes 1.6.20 (1).docx</i> mentions consideration of disadvantaged stakeholders as a part of the stakeholder process.</p>
<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 In a timely manner means (at the latest) four weeks before the first standard-setting activity is scheduled to occur.</p> <p>NOTE 2 Through suitable media means at least through the standardising body's website and by email and/or letter to identified stakeholders. Other media includes press releases, news articles, features in trade-press, information sent to branch organisations, social media, digital media, etc.</p>	Procedures	Y	<p>SSP Chapter 2: <i>Convening the Standard Setting/Review Forum. ... 2.4) The Board of Trustees will publicly announce through various mediums the convening of the ISRP and the start of the Standard revision process.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SSP is in line with the PEFC ST 1001:2017.</p>
	Process	Y	<p>Conclusion: Conformity</p> <p>Justification: A press release published e.g. at the ATFS website was made on August 22, 2019 to announce the AFF's upcoming standard revision process.</p> <p>Announcement of the standard revision process was also circulated through an ATFS e-mail list on August 22, 2019 (included in <i>ATFS Alert Announcing Intent To Revise AFF Standards.pdf</i>).</p> <p>Feedback was received until September 20, 2019, fulfilling the four-week time requirement. Timeline for the process was available online: https://www.treefarmssystem.org/standards-process-timeline.</p>



Indufor

PEFC benchmark requirement	Assessment basis	YES /NO	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	N	Conclusion: Minor non-conformity Justification: The SSP does not specify the contents required for the announcement and invitation.
	Process	Y	Conclusion: Conformity Justification: The press release of August 22, 2019 included an overview of the standard revision process, which was supported by the FAQ & timeline in the ATFS website (https://www.treefarmssystem.org/standards-process-timeline) and a description of the process in the ATFS website (https://www.treefarmssystem.org/standards-process-overview).
(b) access to the proposal for the standard (refer to 6.1),	Procedures	N	Conclusion: Minor non-conformity Justification: The SSP does not specify the contents required for the announcement and invitation.
	Process	Y	Conclusion: Conformity Justification: The basis for the revision process was the previous operative version <i>2015-2020 Standards of Sustainability</i> , a publicly available document.
(c) information about opportunities for stakeholders to participate in the process,	Procedures	N	Conclusion: Minor non-conformity Justification: The SSP does not specify the contents required for the announcement and invitation.



Indufor

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
	Process	Y	<p>Conclusion: Conformity</p> <p>Justification: The press release of August 22, 2019 included an invitation and information about opportunities for stakeholders to participate in the process.</p>
(d) requests to stakeholders to nominate their representative(s) or themselves to the working group (refer to 6.4). The request to disadvantaged stakeholders and key stakeholders shall be made in a manner that ensures that the information reaches intended recipients and in a format that is easy to understand,	Procedures	Y	<p>SSP Chapter 2: <i>Convening the Standard Setting/Review Forum. ... 2.2) The Board of Trustees will invite a representative cross-section of forestry community leaders with a stake in AFF's American Tree Farm System (ATFS) Program, or a sincere interest in forest sustainability on small private forest ownerships in the US to participate on the ISRP. The Board of Trustees will have the discretion to limit the ISRP to a size respective of AFF's financial and staffing resources.</i></p> <p><i>2.3) Interested parties which cannot participate in the ISRP due to their own or AFF financial or staffing resources can present their views and comments through ISRP members or through public consultation.</i></p> <p>Conclusion: Conformity</p> <p>Justification: While not explicitly tied to the announcement and invitation, the SSP necessitates clear and effective communication for requests for stakeholders to nominate their representatives or themselves to the working group in conjunction with the launching of the revision process.</p>
	Process	Y	<p>Conclusion: Conformity</p> <p>Justification: The press release of August 22, 2019 included a request for recommendations for candidates representing the stakeholder groups. The online version included a link to a web-based tool for recommending a candidate. The latter was also provided in the announcement of the standard revision process circulated through an ATFS e-mail list on the same date (included in <i>ATFS Alert Announcing Intent To Revise AFF Standards.pdf</i>).</p>



Indufor

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
(e) explicit invitation and clear instruction on how to submit feedback on the scope and standard-setting process, and	Procedures	N	Conclusion: Minor non-conformity Justification: The SSP does not specify the contents required for the announcement and invitation.
	Process	Y	Conclusion: Conformity Justification: An explicit invitation and clear instructions for how to contribute comments to the standard setting process were provided in conjunction with the press release made on August 22, 2019 and through an ATFS e-mail list on the same date (see <i>ATFS Alert Announcing Intent To Revise AFF Standards.pdf</i>).
(f) access to the standard-setting procedures.	Procedures	N	Conclusion: Minor non-conformity Justification: The SSP does not specify the contents required for the announcement and invitation.
	Process	Y	Conclusion: Conformity Justification: Access to the standard-setting procedures was provided in conjunction with the media referred to in 6.3.1 e: Process.
6.3.2 The standardising body shall review the standard-setting process based on feedback received in response to the public announcement.	Procedures	N	Conclusion: Minor non-conformity Justification: The SSP does not require a review of the standard-setting process.
	Process	Y	Conclusion: Conformity Justification: Feedback concerning the standard-setting procedures was requested in conjunction with the public announcement of the standard review



Indufor

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>process (see e.g. the ATFS website: https://www.treefarmssystem.org/standards-process-timeline).</p> <p>The received feedback and documentation of the AFF response is included in <i>Survey response Standard Setting Procedure 092319.docx</i> and <i>5 Cert Com Standards Setting Procedures Memo FINAL.pdf</i>.</p>
<p>6.4.1 The standardising body shall establish a permanent or temporary working group or adjust the composition of an already existing working group based on nominations it received. Acceptance and refusal of nominations shall be justified in relation to the requirements for balanced representation of the working group, considerations of an appropriate gender balance, relevance of the organisation, an individual's competence, an individual's relevant experience and resources available for standard-setting.</p>	Procedures	Y	<p>SSP Chapter 2: <i>Convening the Standard Setting/Review Forum</i>. 2.1) ... <i>The Board of Trustees will convene an Independent Standard Review Panel (ISRP). This panel will be constituted until it has presented its findings to the AFF Trustees, and upon Trustees receiving the final report, will be adjourned.</i></p> <p>2.2) <i>The Board of Trustees will invite a representative cross-section of forestry community leaders with a stake in AFF's American Tree Farm System (ATFS) Program, or a sincere interest in forest sustainability on small private forest ownerships in the US to participate on the ISRP. The Board of Trustees will have the discretion to limit the ISRP to a size respective of AFF's financial and staffing resources.</i></p> <p>2.3) <i>Interested parties which cannot participate in the ISRP due to their own or AFF financial or staffing resources can present their views and comments through ISRP members or through public consultation.</i></p> <p>SSP Chapter 3: <i>Balanced Representation and Decision Making</i>. 3.1) <i>The ISRP will have a balance of appropriate interests and be constituted in such a manner that no single category of the interest representation can dominate decision making procedures of the group.</i></p> <p>3.2) ... <i>A stakeholder analysis will identify key groups, including disadvantaged stakeholder groups, and will be considered for the ISRP process.</i></p> <p>Conclusion: Conformity</p>



Indufor

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			Justification: The SSP is in line with the PEFC ST 1001:2017.
	Process	Y	Conclusion: Conformity Justification: ISRP was established by the AFF through a process involving a stakeholder mapping exercise and consideration of factors including balanced representation, gender balance, relevance of the organisation, and estimated capacity of the organisation to contribute due to technical expertise and availability of resources. <i>Stakeholder Mapping 2021 ISRP.xlsx</i> includes documentation of the process.
6.4.2 The working group shall:			
(a) have balanced representation and decision-making by stakeholder categories, relevant to the subject matter and geographical scope of the standard, where no single concerned stakeholder group can dominate, nor be dominated in the process, and	Procedures	Y	SSP Chapter 3: <i>Balanced Representation and Decision Making</i> . 3.1) <i>The ISRP will have a balance of appropriate interests and be constituted in such a manner that no single category of the interest representation can dominate decision making procedures of the group.</i> Conclusion: Conformity Justification: The SSP is in line with the PEFC ST 1001:2017.
	Process	Y	Conclusion: Conformity Justification: ISRP included representatives from all regions of the US while incorporating a balanced representation of the identified stakeholder groups. The ISRP composition is included in <i>Stakeholder Mapping 2021 ISRP.xlsx</i> .



Indufor

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
(b) include stakeholders with expertise relevant to the subject matter of the standard, those that affected by the standard, and those that can influence implementation of the standard. The affected stakeholders shall be represented in an appropriate proportion among participants.	Procedures	Y	<p>SSP Chapter 3: <i>Balanced Representation and Decision Making</i>. 3.1) <i>The ISRP will have a balance of appropriate interests and be constituted in such a manner that no single category of the interest representation can dominate decision making procedures of the group.</i></p> <p>3.2) <i>Interest categories shall include, but not necessarily be limited to: scientific and technical community, environmental non- government organizations (ENGOS), forest industry, forest owners, indigenous peoples, workers/trade unions, and public forestry agencies serving family forest owners. A stakeholder analysis will identify key groups, including disadvantaged stakeholder groups, and will be considered for the ISRP process.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SSP is in line with the PEFC ST 1001:2017.</p>
	Process	Y	<p>Conclusion: Conformity</p> <p>Justification: ISRP included stakeholders representing academia, environmental non-profit organizations, state forestry agencies, national natural resource agencies, forest industry, loggers, labor, landowners, landowner associations, and customer interests. The ISRP composition is included in <i>Stakeholder Mapping 2021 ISRP.xlsx</i>.</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	Procedures	N	<p>Conclusion: Minor non-conformity</p> <p>Justification: The objective of acquiring a balanced representation in the working group is clearly reflected throughout SSP Chapter 3. SSP Chapter 2, section 2.3 also states that <i>interested parties which cannot participate in the ISRP due to their own or AFF financial or staffing resources can present their views and comments through ISRP members or through public consultation,</i></p>



Indufor

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
<p>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>			providing for additional means of representation for stakeholders unable to participate in the working group directly. However, the SSP neither requires target-setting for participation of key stakeholders nor proactive outreach to seek their participation.
	Process	Y	<p>Conclusion: Conformity</p> <p>Justification: Targets have been practically set to acquire representation from each stakeholder group listed in the stakeholder analysis, featured in <i>Stakeholder Mapping 2021 ISRP.xlsx</i>. The stakeholder analysis listed best communication modes for each stakeholder group. The final ISRP composition included representation from each stakeholder group.</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	Y	<p>SSP Chapter 3: <i>Balanced Representation and Decision Making</i>. ... 3.3) ... <i>Panelists are to review the current standard and determine if it adequately reflects the seven criteria set forth in the Montreal Process. ... Any modifications to the standard must be reached by panel consensus.</i></p> <p>Conclusion: Conformity</p> <p>Justification: While the SSP does not explicitly state the benchmark requirement, the process described in the SSP necessitates that the working drafts are available to all ISRP members.</p>
	Process	Y	<p>Conclusion: Conformity</p> <p>Justification: The AFF reported that working drafts were communicated via email to ISRP. The ISRP meeting minutes indicate that working drafts have been available to all ISRP members.</p>



Indufor

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
(b) all members of the working group shall be given meaningful opportunities to contribute to the development or revision of the standard and to provide feedback on working drafts, and	Procedures	Y	<p>SSP Chapter 3: <i>Balanced Representation and Decision Making</i>. ... 3.3) ... Any modifications to the standard must be reached by panel consensus.</p> <p>SSP Chapter 4: <i>Meetings, Comments and Consultation</i>. ... 4.2) There will be a minimum of two face-to-face meetings (beginning and ending). Conference calls and other electronic media will be used when deemed appropriate.</p> <p>4.5) Any presented comments or views of the ISRP members as well as their representative organization or other interested parties shall be reviewed and considered in an open and transparent manner. ...</p> <p>Conclusion: Conformity</p> <p>Justification: The SSP is in line with the PEFC ST 1001:2017.</p>
	Process	Y	<p>Conclusion: Conformity</p> <p>Justification: The ISRP meeting minutes reflect that all group members have had meaningful opportunities to contribute to the revision process and provide feedback on the working drafts.</p>
(c) feedback and views given by any member of the working group shall be considered in an open and transparent way where the outcome of these considerations is recorded.	Procedures	Y	<p>SSP Chapter 4: <i>Meetings, Comments and Consultation</i>. ... 4.5) Any presented comments or views of the ISRP members as well as their representative organization or other interested parties shall be reviewed and considered in an open and transparent manner. The comments, responses and respective modifications to the Standard shall be recorded and made available to all members of the ISRP and the Commenter's respective organization(s).</p> <p>Conclusion: Conformity</p> <p>Justification: The SSP is in line with the PEFC ST 1001:2017.</p>



Indufor

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
	Process	Y	<p>Conclusion: Conformity</p> <p>Justification: The ISRP meeting minutes include detailed documentation of the discussions held in the group meetings and indicate that views presented by the group members were considered in an open and transparent way.</p>
6.4.5 The decision of the working group to recommend the final draft for formal approval shall be taken on the basis of consensus. In order to determine whether there is any sustained opposition, the working group can utilise the following methods:			
(a) face-to face meeting(s) where there is a verbal yes/no vote, a show of hands for a yes/no vote; a statement on consensus from the Chair when there are no dissenting voices or hands (votes); a formal ballot, etc.,	Procedures	Y	<p>SSP Chapter 3: <i>Balanced Representation and Decision Making</i>. ... 3.4) <i>The ISRP will make all decisions using a consensus-based approach. ... In order to reach consensus ISRP can utilize the following alternative processes to establish whether there is opposition to the standard:</i></p> <p>(a) <i>A face-to face meeting where there is a verbal yes/no vote;</i> (b) <i>A face-to face meeting where there is a show of hands for a yes/no vote; ...</i> (d) <i>A statement on consensus from the Chair at a face-to face meeting where there are no dissenting voices or hands (votes); ...</i> (f) <i>A formal balloting process where votes are collated for the collective consensus decision.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SSP is in line with the PEFC ST 1001:2017.</p>



Indufor

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
	Process	Y	<p>Conclusion: Conformity</p> <p>Justification: Due to Covid-19 restrictions the ISRP meetings were held virtually. The meeting minutes document that no-objection was systematically ensured from the group members for proposed modifications in the standard.</p> <p>A signed declaration of consensus concerning the final draft submitted to the AFF by ISRP was provided individually by each ISRP member (<i>Consensus Release 091420</i> files)</p>
(b) telephone conference meeting(s) where there is a verbal yes/no vote,	Procedures	Y	<p>Conclusion: Conformity</p> <p>Justification: SSP Chapter 3 provides a definition of the consensus and a process of demonstrating a consensus in a formal balloting process which also applies to telephone conference meetings.</p>
	Process	Y	<p>Conclusion: Conformity</p> <p>Justification: See 6.4.5 a: Process.</p>
(c) e-mail request to the working group for agreement or objection where the members provide a formal (written) response (vote),	Procedures	Y	<p>SSP Chapter 3: <i>Balanced Representation and Decision Making. ... 3.4) In order to reach consensus ISRP can utilize the following alternative processes to establish whether there is opposition to the standard: ...</i></p> <p><i>(e) An e-mail meeting where a request for agreement is provided to members and the members providing written response (a proxy for a vote); or</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SSP is in line with the PEFC ST 1001:2017.</p>



Indufor

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
	Process	Y	Conclusion: Conformity Justification: See 6.4.5 a: Process.
(d) combinations of these methods.	Procedures	Y	Conclusion: Conformity Justification: SSP Chapter 3 provides a definition of the consensus and a process of demonstrating a consensus in a formal balloting process which also applies to combinations of different methods.
	Process	Y	Conclusion: Conformity Justification: See 6.4.5 a: Process.
6.4.6 Where a vote is used in decision-making, the standard-setting procedures shall determine and include decision-making thresholds that quantifies consensus. The threshold must be consistent with the consensus definition (refer to 3.1). However, a majority vote cannot override sustained opposition in order to achieve consensus.	Procedures	N	Conclusion: Minor non-conformity Justification: The requirement of consensus within ISRP is clearly featured in SSP Chapter 3, but the SSP does not include guidelines for determining decision-making thresholds for consensus quantification.
	Process	NA	Conclusion: NA Justification: ISRP meeting minutes indicate that the group was able to reach consensus through discussions throughout the standard revision process without a need for a vote.
6.4.7 When there is sustained opposition to a substantial issue, the issue shall be resolved using the following methods:			
	Procedures	Y	SSP Chapter 3: <i>Balanced Representation and Decision Making. ... 3.4) ... In any case of sustained opposition of any important part of the concerned interests</i>



Indufor

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
(a) finding a compromise through discussion and negotiation on the disputed issue within the working group,			<p><i>to a substantive issue, the issue shall be resolved using the following mechanism:</i></p> <p><i>(a) Discussion and negotiation on the disputed issue within ISRP in order to find a compromise, ...</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SSP is in line with the PEFC ST 1001:2017.</p>
	Process	NA	<p>Conclusion: NA</p> <p>Justification: The ISRP meeting minutes indicate that there was no sustained opposition to any substantial issue in the standard revision process.</p>
(b) finding a compromise through direct negotiation between the stakeholder(s) making the objection and other stakeholders with different views on the disputed issue,	Procedures	Y	<p>SSP Chapter 3: <i>Balanced Representation and Decision Making. ... 3.4) ... In any case of sustained opposition of any important part of the concerned interests to a substantive issue, the issue shall be resolved using the following mechanism: ...</i></p> <p><i>(b) Direct negotiation between the ISRP member submitting the objection and member(s) with different view on the disputed issue in order to find a compromise, ...</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SSP is in line with the PEFC ST 1001:2017.</p>
	Process	NA	<p>Conclusion: NA</p> <p>Justification: The ISRP meeting minutes indicate that there was no sustained opposition to any substantial issue in the standard revision process.</p>



Indufor

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
(c) additional round(s) of public consultation (if necessary) where further stakeholder input can help to achieve consensus on unresolved issues. The standardising body determines the scope and duration of any additional public consultation.	Procedures	N	Conclusion: Minor non-conformity Justification: The SSP and the DAP do not include a public consultation round for addressing ISRP dispute resolution and consensus-reaching.
	Process	NA	Conclusion: NA Justification: The ISRP meeting minutes indicate that there was no sustained opposition to any substantial issue in the standard revision process.
6.4.8 When a substantial issue cannot be resolved and sustained opposition persists, the standardising body shall initiate dispute resolution in accordance with its procedures for impartial and objective action.	Procedures	Y	SSP Chapter 9: <i>Dispute Resolution and Appeals Processes. 9.1) All complaints, disputes or appeals relating to AFF Standard Setting can be submitted and shall be resolved according to AFF Disputes and Appeals Procedures.</i> Conclusion: Conformity Justification: The SSP is in line with the PEFC ST 1001:2017.
	Process	NA	Conclusion: NA Justification: The ISRP meeting minutes indicate that there was no sustained opposition to any substantial issue in the standard revision process.
6.5.1 The standardising body shall organise public consultation on the enquiry draft and shall ensure that:			
(a) the start and the end dates of public consultation are announced in a timely manner through suitable media,	Procedures	Y	Conclusion: Conformity Justification: The SSP does not provide explicit guidance on announcing the start and the end dates of the public consultation, but practically the public



Indufor

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
NOTE <i>In a timely manner</i> means (at the latest) the day before the start of public consultation.			consultation process described in SSP Chapter 5 including e.g. the requirement for a 60-day consultation period necessitates the dates to be public.
	Process	Y	Conclusion: Conformity Justification: The start and the end dates of public consultation were communicated to the public through the AFF website (https://www.treefarmssystem.org/standards-process-timeline) and by a press release and ATFS/AFF network communications (<i>ATFS Alert Announcing Intent To Revise AFF Standards.pdf</i>).
(b) a direct invitation to comment on the enquiry draft is sent to each stakeholder identified by stakeholder identification mapping (refer to 6.2) aiming for a balanced participation of stakeholder groups,	Procedures	N	SSP Chapter 3: <i>Balanced Representation and Decision Making</i> 3.8) Upon acceptance and adoption of the Standard by the AFF Board of Trustees, AFF will make the Standard publicly available. SSP Chapter 4: <i>Meetings, Comments and Consultation</i> 4.5) ... The comments, responses and respective modifications to the Standard shall be recorded and made available to all members of the ISRP and the Commenter's respective organization(s). Conclusion: Minor non-conformity Justification: The SSP does not stipulate that a direct invitation to comment the draft would be proactively sent to each stakeholder identified in the stakeholder analysis required by the SSP Chapter 3, section 3.2. The SSP does require however that the draft is made publicly available and the ISRP members and organizations that provided comments are kept informed of comments, responses and respective modifications.
	Process	Y	Conclusion: Conformity



Indufor

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			Justification: Stakeholders were kept informed on the standard revision process and requested to comment drafts through multiple channels, including e.g. ATFS/AFF network communications, updates on the AFF website, and webinars.
(c) invitations are sent to disadvantaged and key stakeholders by methods that ensure they reach recipients and are easy to understand,	Procedures	N	Conclusion: Minor non-conformity Justification: The SSP does not stipulate that an invitation to comment the draft would be proactively sent to disadvantaged and key stakeholders through considered methods.
	Process	Y	Conclusion: Conformity Justification: See 6.5.1 b: Process. The stakeholder analysis identified no major special requirements concerning disadvantaged stakeholders.
(d) the enquiry draft is made publicly available,	Procedures	Y	SSP Chapter 5: <i>Public Review and Comment on Proposed Standard. 5.1) Upon consensus of the ISRP, the Standard shall be made available for public review and comment.</i> Conclusion: Conformity Justification: The SSP is in line with the PEFC ST 1001:2017.
	Process	Y	Conclusion: Conformity Justification: Feedback from the draft standards was collected through public consultation.



Indufor

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
(e) public consultation is for at least 60 days,	Procedures	Y	<p>SSP Chapter 5: <i>Public Review and Comment on Proposed Standard. ... 5.2) The public shall have no less than 60 days from the release of the proposed Standard to review and respond with comments.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SSP is in line with the PEFC ST 1001:2017.</p>
	Process	Y	<p>Conclusion: Conformity</p> <p>Justification: The draft standards underwent two 60-day public consultation periods.</p>
(f) all feedback is considered by the working group in an objective manner, and	Procedures	Y	<p>SSP Chapter 5: <i>Public Review and Comment on Proposed Standard. ... 5.5) The ISRP will review all comments and upon consensus, adopt any modifications from the public comments that it may find appropriate.</i></p> <p><i>5.6) The comments, responses to received comments and relevant modifications shall be made available to Commenters and public upon request of from AFF's website.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The requirements for balanced representation in ISRP, the requirement of consensus in their decision-making, and feedback being made publicly available along with responses to the feedback as per the SSP requirements promote objective consideration of feedback by the working group.</p>
	Process	Y	<p>Conclusion: Conformity</p>



Indufor

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			Justification: All feedback provided by the public was made available to ISRP. The consideration of the feedback by ISRP was done in an objective manner as demonstrated in the ISRP meeting minutes.
<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	Y	<p>SSP Chapter 4: <i>Meetings, Comments and Consultation</i>. ... 4.4) <i>Information on the standard setting process and document development is made available to interested parties upon request or through AFF's website.</i></p> <p>4.5) ... <i>The comments, responses and respective modifications to the Standard shall be recorded and made available to all members of the ISRP and the Commenter's respective organization(s).</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SSP is in line with the PEFC ST 1001:2017.</p>
	Process	N	<p>Conclusion: Minor non-conformity</p> <p>Justification: Synopsis of the feedback received from the first 60-day public commenting period was made publicly available through a webinar available at https://vimeo.com/400021774/65a8990cc9 and accessible from the ATFS website.</p> <p>The synopsis provided in the webinar did not include the outcomes of considering the issues. There is also no indication of sending the synopsis directly to parties who gave feedback.</p>
	Procedures	Y	Conclusion: Conformity



Indufor

PEFC benchmark requirement	Assessment basis	YES /NO	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.			<p>Justification: The focus of the present version of the SST is mainly on standard revision rather than creating a new standard, as is more relevant in the case of the ATFS.</p> <p>Comment: It is recommended that the requirement of a second round of public consultation for new standards is included in the SSP.</p>
	Process	NA	<p>Conclusion: NA</p> <p>Justification: The AFF did not create a new standard during this process. However, a second round of public consultation was organised, lasting 60 days.</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. NOTE Pilot testing is not required for revision of an existing standard when experience from its usage can substitute for pilot testing.	Procedures	Y	<p>SSP Chapter 3: <i>Balanced Representation and Decision Making</i>. ... 3.7) <i>Upon presentation of the Standard from the ISRP, AFF will have the option of pilot testing any revisions or modifications to the Standard. Pilot testing will be used to ensure that the modification or revision is auditable, efficient and implementable.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SSP is in line with the PEFC ST 1001:2017.</p>
	Process	NA	<p>Conclusion: NA</p> <p>Justification: The AFF did not create a new standard during this process.</p>
Approval and Publication			



Indufor

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
7.1 The standardising body shall approve the standard(s)/normative document(s) formally when there is evidence of consensus among the working group.	Procedures	Y	SSP Chapter 3: <i>Balanced Representation and Decision Making</i> 3.4) ... <i>ISRP shall provide evidence on consensus having been reached before the formal approval of the standard</i> Conclusion: Conformity Justification: The SSP is in line with the PEFC ST 1001:2017.
	Process	Y	Conclusion: Conformity Justification: The AFF Board of Trustees approved the standards formally in November 2020 after signed declarations of consensus had been received from the ISRP members.
7.2.1 The formally approved standard(s)/normative document(s) shall be published and made publicly available at no cost within 14 days of approval, or as otherwise defined by the standardising body.	Procedures	Y	Conclusion: Conformity Justification: The SSP requires the standard setting process to be highly transparent including public availability of documentation of the process. This also concerns the formally approved version of the standards.
	Process	Y	Conclusion: Conformity Justification: The formally approved standards were published on ATFS website: https://www.treefarmssystem.org/view-standards .
7.2.2 Standard(s) shall include:			
	Procedures	N	Conclusion: Minor non-conformity



Indufor

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
(a) identification and contact information for the standardising body,			Justification: The SSP places no requirements on inclusion of standardising body identification and contact information into the standards.
	Process	Y	Conclusion: Conformity Justification: The SSP establishes the AFF unambiguously as the standardising body and includes full identification and contact information for the AFF.
(b) official language of the standard,	Procedures	N	Conclusion: Minor non-conformity Justification: The SSP places no requirements on inclusion of a notification of the standard official language into the standards.
	Process	N	Conclusion: Minor non-conformity Justification: The official language of the standards is not explicitly defined in the standards. However, all normative documents encompassing the ATFS are provided primarily in English, and the context of the standards practically establishes English as their official language.
(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	NA	Conclusion: NA Justification: The ATFS normative documents are by default published in English and the same versions of the documents are used in endorsement by the PEFC Council.
	Process		
(d) The approval date and the date of next periodic review	Procedures	N	Conclusion: Minor non-conformity Justification: The SSP places no requirements on inclusion of the approval date and the date of next periodic review into the standards.



Indufor

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
NOTE The date of next periodic review may be within a shorter period than five years based on (for example) stakeholder expectations or other foreseen developments.	Process	Y	Conclusion: Conformity Justification: The approval date is featured in all ATFS normative documents considered in this assessment. The date of the next periodic review is not explicitly featured but practically established by the SSP, which states that <i>the AFF Board of Directors (Board of Trustees), will, at its discretion, but not exceeding a five-year period from the approval of the last standard revision, initiate a standard review process.</i>
7.2.3 Printed copies shall be made available upon request at a price that covers no more than administrative costs (if any)	Procedures	N	SSP Chapter 1: <i>Standard Setting Principles. ... 1.4) AFF will make all relevant documents publicly available for interested parties to follow the developments during and after the process.</i> Conclusion: Minor non-conformity Justification: The SSP does not require making the standard available in printed copies.
	Process	Y	Conclusion: Conformity Justification: The AFF reported that copies of the standards were printed and distributed to the ATFS State programs for distribution to the network.
7.2.4 The standardising body shall make the development report (refer to PEFC GD 1007) publicly available	Procedures	Y	SSP Chapter 1: <i>Standard Setting Principles. ... 1.4) AFF will make all relevant documents publicly available for interested parties to follow the developments during and after the process.</i> SSP Chapter 4: <i>Meetings, Comments and Consultation. ... 4.4) Information on the standard setting process and document development is made available to interested parties upon request or through AFF's website.</i>



Indufor

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			Conclusion: Conformity Justification: The SSP meets the requirements of the PEFC ST 1001:2017.
	Process	N	Conclusion: Minor non-conformity Justification: The development report of the ATFS is comprised of multiple individual documents and files that together provide the information required by the PEFC GD 1007. However, not all these documents and files have been made publicly available.
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	Y	<p>SSP Chapter 2: <i>Convening the Standard Setting/Review Forum.</i> 2.1) <i>The AFF Board of Directors (Board of Trustees), will, at its discretion, but not exceeding a five-year period from the approval of the last standard revision, initiate a standard review process. The Board of Trustees will convene an Independent Standard Review Panel (ISRP). ...</i></p> <p>2.2) <i>The Board of Trustees will invite a representative cross-section of forestry community leaders with a stake in AFF's American Tree Farm System (ATFS) Program, or a sincere interest in forest sustainability on small private forest ownerships in the US to participate on the ISRP. ...</i></p> <p>SSP Chapter 5: <i>Public Review and Comment on Proposed Standard.</i> 5.1) <i>Upon consensus of the ISRP, the Standard shall be made available for public review and comment.</i></p> Conclusion: Conformity Justification: The SSP stipulates that the standards need to be reviewed between intervals not exceeding five years. Stakeholder consultation is acquired



Indufor

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			through engagement of ISRP and through public consultation. The work of ISRP practically requires a gap analysis and consideration of feedback.
	Process	Y	<p>Conclusion: Conformity</p> <p>Justification: The previous operative version of the standards <i>2015-2020 Standards of Sustainability</i> were enacted on January 1, 2015. The revised standards were approved by the AFF Board of Trustees in November 2020 to be enacted January 1, 2021.</p> <p>A gap analysis was conducted, available in <i>AFF PEFC Gap 090619.xlsx</i>, and public feedback from the previous operative version of the standards was requested prior to initiating the revision work of ISRP. The results of the latter are summarised in <i>Public Comment Period #1 – Summary.docx</i>.</p> <p>A thorough stakeholder consultation was organised through engagement of ISRP.</p>
<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	N	<p>SSP Chapter 9: <i>Dispute Resolution and Appeals Processes</i>. 9.1) <i>All complaints, disputes or appeals relating to AFF Standard Setting can be submitted and shall be resolved according to AFF Disputes and Appeals Procedures.</i></p> <p>Conclusion: Minor non-conformity</p> <p>Justification: The only permanent feedback mechanism referred to by the SSP is the dispute resolution and appeals process, detailed in the DAP. The core purpose of the DAP deviates from the purpose intended by the benchmark and the DAP does not indicate any web-based mechanism for feedback provision.</p>
	Process	Y	Conclusion: Conformity



Indufor

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>Justification: The ATFS website includes contact information that can be used for provision of feedback (https://www.treefarmssystem.org/contact-american-tree-farm-system).</p> <p>Comment: It is recommended that the feedback provision aspect is made explicit in the website contact point.</p>
8.2.2 All feedback received through all channels, including meetings, training courses, etc. shall be recorded and considered.	Procedures	N	<p>SSP Chapter 1: <i>Standard Setting Principles</i>. ... 1.3) <i>AFF will see continual improvement of the standard and undergo periodic review.</i></p> <p>SSP Chapter 8: <i>Openness, Transparency and Public Availability</i>. 8.1) <i>All records, minutes, communications and other pertinent and tangible evidence of the process will be made available to the public at its request.</i></p> <p>Conclusion: Minor non-conformity</p> <p>Justification: The SSP states commitment to continuous improvement of the standard and generally promotes thorough documentation of processes. However, the feedback recording and consideration procedures stipulated by the SSP focus on the standard setting/revision process and omit any feedback received throughout the standard's life span.</p>
	Process	N	<p>Conclusion: Minor non-conformity</p> <p>Justification: It remains unclear how feedback received outside of the feedback channels established for a specific purpose (e.g. the 60-day public consultations) is addressed within the ATFS.</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,	Procedures	N	<p>Conclusion: Minor non-conformity</p> <p>Justification: This step is not explicitly featured in the SSP.</p>



Indufor

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
and other relevant standards to identify potential gaps in the standard.	Process	Y	Conclusion: Conformity Justification: A gap analysis documented in <i>AFF PEFC Gap 090619.xlsx</i> was conducted by the AFF at the start of the review process. However, the scope of the gap analysis was narrower than defined in the benchmark, lacking a component to assess the standards against relevant legislation.
8.3.2 The standardising body shall consider the latest scientific knowledge, research and relevant emerging issues.	Procedures	N	Conclusion: Minor non-conformity Justification: This step is not explicitly featured in the SSP (see 8.3.1).
	Process	Y	Conclusion: Conformity Justification: This step was addressed by ISRP which considered topics within the scope of this benchmark in their meetings (e.g. forest conversion and GMOs). The discussion and resolutions are documented in ISRP meeting minutes.
8.4.1 Where the feedback and the gap analysis do not identify a need to revise the standard, the standardising body shall organise stakeholder consultation to determine whether stakeholders see a need for revising the standard. The standardising body shall include the gap analysis in the stakeholder consultation.	Procedures	Y	SSP Chapter 2: <i>Convening the Standard Setting/Review Forum. 2.1) The AFF Board of Directors (Board of Trustees), will, at its discretion, but not exceeding a five-year period from the approval of the last standard revision, initiate a standard review process. The Board of Trustees will convene an Independent Standard Review Panel (ISRP). This panel will be constituted until it has presented its findings to the AFF Trustees, and upon Trustees receiving the final report, will be adjourned.</i> <i>2.3) Interested parties which cannot participate in the ISRP due to their own or AFF financial or staffing resources can present their views and comments through ISRP members or through public consultation.</i> Conclusion: Conformity



Indufor

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			Justification: The SSP stipulates that ISRP representing stakeholders is engaged for the standard review process.
	Process	Y	Conclusion: Conformity Justification: A thorough stakeholder consultation was organised through engagement of ISRP.
8.4.2 At the start of a review, the standardising body shall update the stakeholder identification mapping (refer to clause 6.2).	Procedures	Y	SSP Chapter 2: <i>Convening the Standard Setting/Review Forum. ... 2.2) The Board of Trustees will invite a representative cross-section of forestry community leaders with a stake in AFF's American Tree Farm System (ATFS) Program, or a sincere interest in forest sustainability on small private forest ownerships in the US to participate on the ISRP. ...</i> 3.2) <i>... A stakeholder analysis will identify key groups, including disadvantaged stakeholder groups, and will be considered for the ISRP process.</i> Conclusion: Conformity Justification: The SSP is in line with the PEFC ST 1001:2017.
	Process	Y	Conclusion: Conformity Justification: The AFF conducted a stakeholder mapping exercise for assembling ISRP (<i>Stakeholder Mapping 2021 ISRP.xlsx</i>).
8.4.3 The standardising body shall organise:			
(a) a public consultation period of at least 30 days (following the requirements of clause 6.5.1) and/or,	Procedures	Y	SSP Chapter 5: <i>Convening the Standard Setting/Review Forum. ... 5.2) The public shall have no less than 60 days from the release of the proposed Standard to review and respond with comments.</i>



Indufor

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			Conclusion: Conformity Justification: The SSP is in line with the PEFC ST 1001:2017.
	Process	Y	Conclusion: Conformity Justification: Two 60-day public consultation periods were organised during the standard revision process.
(b) stakeholder meetings.	Procedures	Y	SSP Chapter 3: <i>Balanced Representation and Decision Making. ... 3.5) Upon completion and consensus of the ISRP, the recommended standard revisions/modifications will be presented to the AFF Board of Trustees for approval and adoption.</i> Conclusion: Conformity Justification: The SSP requires that the adoption of revised standards is preceded by ISRP review process. SSP Chapter 4 states that <i>there will be a minimum of two face-to-face meetings</i> by ISRP.
	Process	Y	Conclusion: Conformity Justification: ISRP held 10 meetings documented in meeting minutes.
8.4.4 The standardising body shall announce the review in a timely manner (refer to 6.3).	Procedures	Y	SSP Chapter 2: <i>Convening the Standard Setting/Review Forum. ... 2.4) The Board of Trustees will publicly announce through various mediums the convening of the ISRP and the start of the Standard revision process.</i> Conclusion: Conformity Justification: The SSP is in line with the PEFC ST 1001:2017.



Indufor

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
	Process	Y	<p>Conclusion: Conformity</p> <p>Justification: A press release published e.g. at the ATFS website was made on August 22, 2019 to announce the AFF's upcoming standard revision process.</p> <p>Announcement of the standard revision process was also circulated through an ATFS e-mail list on August 22, 2019 (included in <i>ATFS Alert Announcing Intent To Revise AFF Standards.pdf</i>).</p>
8.5.1 Based on the feedback received during the period of a standard's implementation, the outcome of the gap analysis and the consultations, the standardising body shall decide whether to reaffirm the standard or whether a revision of the standard is necessary.	Procedures	NA	<p>SSP Chapter 2: <i>Convening the Standard Setting/Review Forum. 2.1) The AFF Board of Directors (Board of Trustees), will, at its discretion, but not exceeding a five-year period from the approval of the last standard revision, initiate a standard review process. The Board of Trustees will convene an Independent Standard Review Panel (ISRP). This panel will be constituted until it has presented its findings to the AFF Trustees, and upon Trustees receiving the final report, will be adjourned.</i></p> <p>Conclusion: NA</p>
	Process		<p>Justification: The ATFS involves by default a revision of the standards between intervals not exceeding five years. The ATFS does not recognize reaffirmation of the standards as an option to the revision process.</p>
8.5.2 The decision shall be made at the highest decision-making level of the standardising body	Procedures	NA	<p>Conclusion: NA</p> <p>Justification: See 8.5.1.</p>
	Process		
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	NA	<p>Conclusion: NA</p> <p>Justification: See 8.5.1.</p>
	Process		



Indufor

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
8.5.4 Where the decision is to revise the standard, the standardising body shall specify the type of revision (normal or editorial revision).	Procedures	NA	SSP Chapter 2: <i>Convening the Standard Setting/Review Forum. 2.1) The AFF Board of Directors (Board of Trustees), will, at its discretion, but not exceeding a five-year period from the approval of the last standard revision, initiate a standard review process. The Board of Trustees will convene an Independent Standard Review Panel (ISRP). This panel will be constituted until it has presented its findings to the AFF Trustees, and upon Trustees receiving the final report, will be adjourned.</i> Conclusion: NA Justification: The ATFS involves by default a normal revision of the standards between intervals not exceeding five years. The ATFS does not recognize editorial revision of the standards as an option to the normal revision process.
	Process		
Revision of standards			
9.1 Procedures for revision of standard(s)/normative document(s) shall conform to those stated in section 6. A normal revision can occur at the periodic review, or between periodic reviews, but does not include editorial revisions and time-critical revisions.	Procedures	N	Conclusion: Minor non-conformity Justification: The ATFS standard-setting procedures include minor non-conformities with the procedures required by the following benchmarks of the PEFC ST 1001:2017 section 6: 6.1.1 e; 6.1.2; 6.3.1 a, b, c, e, f; 6.4.3; 6.4.6; 6.4.7 c; 6.5.1 b, c.
	Process	N	Conclusion: Minor non-conformity Justification: The applied ATFS standard-setting process includes a minor non-conformity with the process required by benchmark 6.5.1 g.
	Procedures	NA	



Indufor

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
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.	Process		<p>SSP Chapter 2: <i>Convening the Standard Setting/Review Forum. 2.1) The AFF Board of Directors (Board of Trustees), will, at its discretion, but not exceeding a five-year period from the approval of the last standard revision, initiate a standard review process. The Board of Trustees will convene an Independent Standard Review Panel (ISRP). This panel will be constituted until it has presented its findings to the AFF Trustees, and upon Trustees receiving the final report, will be adjourned.</i></p> <p>Conclusion: NA</p> <p>Justification: The ATFS involves by default a normal revision of the standards between intervals not exceeding five years. The ATFS does not recognize editorial revision of the standards as an option to the normal revision process.</p> <p>Note: the ATFS includes a National Standards Interpretation Committee (NSIC) seated by the AFF Board of Trustees and charged with making interpretations of the standards between the revision rounds. However, the NSIC mandate does not include a standard revision process.</p>
9.3.1 A time-critical revision is a revision between two periodic reviews using a fast-track process.	Procedures	NA	<p>SSP Chapter 2: <i>Convening the Standard Setting/Review Forum. 2.1) The AFF Board of Directors (Board of Trustees), will, at its discretion, but not exceeding a five-year period from the approval of the last standard revision, initiate a standard review process. The Board of Trustees will convene an Independent Standard Review Panel (ISRP). This panel will be constituted until it has presented its findings to the AFF Trustees, and upon Trustees receiving the final report, will be adjourned.</i></p> <p>Conclusion: NA</p>
	Process		



Indufor

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			Justification: The ATFS involves by default a normal revision of the standards between intervals not exceeding five years. The ATFS does not recognize time-critical revision of the standards as an option to the normal revision process.
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	NA	Conclusion: NA
	Process		Justification: The ATFS involves by default a normal revision of the standards between intervals not exceeding five years. The ATFS does not recognize time-critical revision of the standards as an option to the normal revision process.
(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	NA	Conclusion: NA
	Process		Justification: See 9.3.2 a.
9.3.3 The time-critical revision shall follow these steps:			
(a) The standardising body shall draft the revised standard,	Procedures	NA	Conclusion: NA
	Process		Justification: The ATFS involves by default a normal revision of the standards between intervals not exceeding five years. The ATFS does not recognize time-critical revision of the standards as an option to the normal revision process.
(b) The standardising body may consult stakeholders, but it is not mandatory,	Procedures	NA	Conclusion: NA
	Process		Justification: See 9.3.3 a.



Indufor

PEFC benchmark requirement	Assessment basis	YES /NO	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,	Procedures	NA	Conclusion: NA Justification: See 9.3.3 a.
	Process		
(d) The standardising body shall explain the justification for the urgent change(s) and make the justification publicly available.	Procedures	NA	Conclusion: NA Justification: See 9.3.3 a.
	Process		
9.4.1 A revision shall define the application date and transition period of the revised standard(s)/normative document(s).	Procedures	N	Conclusion: Minor non-conformity Justification: The SSP does not require definition of the application date and transition period of the revised standards.
	Process	Y	Conclusion: Conformity Justification: The application date and transition period were defined at the ATFS website at https://www.treefarmssystem.org/standards-process-timeline and also featured in the IMG.
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	N	Conclusion: Minor non-conformity Justification: See 9.4.1.
	Process	Y	Conclusion: Conformity Justification: The formal enactment of the standards took place in January 2021. The IMG states that <i>2021 will be an implementation year during which adjustments will need to be made to the program to bring the IMG into conformance with the requirements contained herein.</i>



Indufor

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
9.4.3 The transition period shall not exceed one year. The standardising body may determine a longer period when justified by exceptional circumstances.	Procedures	N	Conclusion: Minor non-conformity Justification: See 9.4.1.
	Process	Y	Conclusion: Conformity Justification: The transition period was defined as one year in the IMG and at the ATFS website at https://www.treefarmssystem.org/standards-process-timeline .

0 3 Application documentation

The application for the endorsement and mutual recognition as defined in PEFC GD 1007 shall include information which enables the assessment of the applicant system's compliance with the PEFC Council requirements.

The application documentation should identify and make reference to other detailed documentation such as minutes, internal procedures and rules, reports, etc. which do not need to create a part of the application documentation.

Asses. basis* The standard setting is assessed against the PEFC Council requirements in two stages: (i) compliance of written standard setting procedures ("Procedures") and (ii) compliance of the standard setting process itself ("Process").

For "Procedures" the applicant should refer to the part(s) of its standard setting procedures related to the respective PEFC requirement.

For "Process" the applicant should either refer to the report/records of the standard setting process forming a part of the submitted application documents, or describe how the PEFC requirement was fulfilled during the standard setting process.

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

1 Scope

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

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

Reference documents:

Document type	Document name
Normative documents	American Forest Foundation (AFF) 2021 Standards of Sustainability V 2.0, June 22, 2022 (hereafter “SS”) * American Tree Farm System Eligibility Requirements and Guidance for Certification V2.0, June 22, 2022 (hereafter “ERGC”) * American Tree Farm System 2021 Independently Managed Group (IMG) Certification Standards, March 10, 2022 (hereafter “IMG”) AFF Dispute and Appeals Procedures, May 20, 2021 (hereafter “DAP”)
Descriptive documents	2020 Public Summary Report. American Tree Farm System (ATFS) Northeast, Southern and West Central Regions. American Forest Foundation 2015-2020 Standards of Sustainability for Forest Certification (AFF Standard), December 18, 2020 American Tree Farm System Volunteer No Harassment Policy, September 6, 2017 Memorandum of Understanding Agreement Between The American Tree Farm System And International Association of Machinists and Aerospace Workers (IAMAW), November 12, 2007 (hereafter “MoU ATFS–IAMAW”)
Other documents	Forest Practice Administrative Rules and Forest Practices Act. Chapter 629 Forest Practices Administration. Oregon Department of Forestry, February 2018 with April 2018 corrections. Georgia’s Best Management Practices for Forestry. Georgia Forestry Commission, 2019. Montana Forestry Best Management Practices. Montana Department of Natural Resources and Conservation, 2015. Vermont Water Quality. Acceptable Management Practices. Manual for Logging Professionals. Vermont Agency of Natural Resources, 2019.

* The final approval of the document by the standardising body is pending at the date of the assessor’s final draft report.



Indufor

2 Checklist

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
4. Context of the national standard and the organisations applying a PEFC endorsed standard		
4.1 General		
The requirements for sustainable forest management defined by regional, national or sub-national forest management standards shall:		
a) include management and performance requirements that are applicable at the forest management unit level, or at another level as appropriate, to ensure that the intent of all requirements is achieved at the forest management unit level;	Y	<p>SS, Standards Prologue: <i>The American Forest Foundation's (AFF) 2021 Standards of Sustainability for Forest Certification (Standards) promote the health and sustainability of America's family forests. These Standards are designed as a tool to help woodland owners be effective stewards of the land as they adaptively manage renewable resources; promote environmental, economic and social benefits; and work to increase public understanding of sustainable forestry. The Standards are based on international sustainability metrics and North American guidelines for sustainable forest management and serve as the basis for the American Tree Farm System® (ATFS) certification program. ...</i></p> <p>ERGC, Acreage Limitations for ATFS Certification: <i>Individual forest owners may enroll contiguous properties from 10 acres to 20,000 acres.</i></p> <p>SS, Standard 1, Performance Measure (PM) 1.1: <i>Landowner shall have and implement a written forest management plan consistent with the size of the forest and the scale and intensity of the forest activities.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The ERGC limits the certifiable forest property of an individual forest owner between 10 acres and 20,000 acres, and the SS requires that a forest</p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		management plan consistent with the size of the forest and the scale and intensity of the forest activities is prepared and implemented. The SS are consistently related to the management plan and apply a level of detail that is applicable to a forest management unit.
b) be clear, performance based and auditable;	Y	Conclusion: Conformity Justification: The standards are clearly written and auditable. They are also performance based, with each of the eight standards included in the SS applying performance measures which are assessed based on detailed indicators.
c) apply to activities of all forest operators in the defined forest area who have an impact on achieving compliance with the requirements;	Y	Conclusion: Conformity Justification: The SS consist of eight standards each with performance requirements that are applicable at the forest management unit level, which collectively cover the key elements of sustainable forest management.
d) require record-keeping that provides evidence of compliance with the requirements of the forest management standards;	Y	<p>SS, Standards Prologue: ... <i>Throughout this document, landowners are encouraged to develop and retain documents related to their management activities. Documents should be retained for three years, as a general rule of thumb, although some landowners may retain documents much longer, while other may not retain documents at all. ...</i></p> <p>SS, Standard 1, PM 1.1, I 1.1.1: <i>Management plan shall be active, adaptive and embody the landowner's current objectives, remain appropriate for the land certified and reflect the current state of knowledge about natural resources and sustainable forest management.</i></p> <p>SS, Standard 1, PM 1.1, I 1.1.3: <i>The Landowner should monitor for changes that could interfere with the management objectives as stated in management plan. GUIDANCE: ... Landowners and designated representatives are encouraged to keep a written record</i></p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p><i>of monitoring observations to reflect and document changing conditions-- including the presence of invasive species, pest or disease or storm damage-- along with management activities. ...</i></p> <p>SS, Standard 8, PM 8.1, I 8.1.3: <i>Landowners should retain appropriate contracts or records for forest product harvests and other management activities to demonstrate conformance to the Standards.</i></p> <p>Conclusion: Conformity</p> <p>Justification: While the direct record-keeping requirements for landowners featured in the SS are formulated as optional, the SS practically requires written forest management plans that are kept up to date, clearly stated landowner objectives, descriptions of desired forest conditions and other records that are sufficient to demonstrate conformance to the management standards.</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 claim "100% PEFC certified", and their translations into languages other than English, are published online on the PEFC website www.pefc.org.</p>	NA	<p>Conclusion: NA</p> <p>Justification: The ATFS does not contain a PEFC chain of custody component.</p>
<p>f) require that where owners/managers of forests are selling products from areas other than covered by the standard, only products from areas covered by the standard are sold with the claim "100% PEFC-certified" or a system specific claim;</p>	NA	<p>Conclusion: NA</p> <p>Justification: See 4.1 e</p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
g) require that claims on the origin of products in an area covered by the standard are only made by forest owners/managers covered by a PEFC recognised certificate issued against the standard;	NA	Conclusion: NA Justification: See 4.1 e
h) specify requirements concerning the information which need to be provided to a PEFC chain of custody certified customer;	NA	Conclusion: NA Justification: See 4.1 e
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.	N	SS, Standard 2: <i>Compliance with Laws. Forest management activities comply with all relevant federal, state and local laws, regulations and ordinances.</i> Conclusion: Minor non-conformity Justification: The requirement to comply with all relevant legislation is clearly featured in the SS, but there are shortcomings in providing reference to applicable legislation in relation to the following PEFC ST 1003:2018 benchmarks: 6.3.1.3, 6.3.2.1, 6.3.2.2, 6.3.4.3, 8.1.4.
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;	N	Conclusion: Minor non-conformity Justification: The SS places no requirements on individual certificate holders to determine the affected stakeholders. Concerning IMGs, the conformity with this benchmark is assessed in the <i>ATFS PEFC Checklist Group Forest Management</i> , section 4.2.1 a.



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
b) the relevant needs and expectations of these stakeholders.	N	<p>Conclusion: Minor non-conformity</p> <p>Justification: See 4.2 a.</p> <p>Concerning IMGs, the conformity with this benchmark is assessed in the <i>ATFS PEFC Checklist Group Forest Management</i>, section 4.2.1 b.</p>
4.3 Determining the scope of the management system		
4.3.1 The standard requires that the organisation shall determine the boundaries and applicability of the management system to establish its scope.	Y	<p>SS, How to Use the Standards: <i>The Standards are designed to accommodate the range and diversity of family and small to mid-sized woodlands. As such, the AFF Standards should be utilized adaptively and as appropriate for the size, scale and intensity of the woodlands and operations.</i></p> <p>ERGC, Acreage Limitations for ATFS Certification: <i>Individual forest owners may enroll contiguous properties from 10 acres to 20,000 acres. ... The evaluator is to deduct nonforest acres from the total acreage of the parcel. ...</i></p> <p>SS, Structure and Demonstrating Conformance: <i>... All components of each Standard apply to every property certified under the AFF Standards. ...</i></p> <p>SS, Standard 1, PM 1.1, I 1.1.1: <i>Management plan shall be active, adaptive and embody the landowner's current objectives, remain appropriate for the land certified and reflect the current state of knowledge about natural resources and sustainable forest management.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SS and the ERGC practically require determination of boundaries and applicability of the management system.</p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		Concerning IMGs, the conformity with this benchmark is assessed in the <i>ATFS PEFC Checklist Group Forest Management</i> , section 4.3.2.
4.3.2 The standard requires that forest management shall comprise the cycle of inventory and planning, implementation, monitoring and evaluation, and shall include an appropriate assessment of the social, environmental and economic impacts of forest management practices. This shall form a basis for a cycle of continuous improvement.	Y	<p>SS, Standard 1, PM 1.1, I 1.1.1: <i>Management plan shall be active, adaptive and embody the landowner's current objectives, remain appropriate for the land certified and reflect the current state of knowledge about natural resources and sustainable forest management.</i></p> <p>SS, Standard 1, PM 1.1, I 1.1.2: <i>Management plans shall describe current forest conditions, landowner's current objectives, management activities aimed at achieving landowner's objectives, document a feasible strategy for activity implementation and include a map accurately depicting significant forest-related resources.</i></p> <p><i>The forest management plan shall demonstrate consideration of the following resource elements: forest health, soil, water, wood and fiber production, threatened or endangered species, special sites, invasive species and forests of recognized importance. Where present and relevant to the property, the plan shall describe management activities related to these resource elements.</i></p> <p><i>Where present, relevant to the property and consistent with landowner's objectives, the plan preparer should consider, describe and evaluate the following resource elements: fire, wetlands, desired species, recreation, conversion, forest aesthetics, biomass and carbon.</i></p> <p>SS, Standard 1, PM 1.1, I 1.1.3: <i>The Landowner should monitor for changes that could interfere with the management objectives as stated in management plan. GUIDANCE: ... Landowners are encouraged to update management plans based on monitoring.</i></p> <p>SS, Standard 5, PM 5.1, I 5.1.1: <i>Landowner shall periodically confer with natural resource agencies, state natural resource heritage programs, qualified natural resource professionals or other current sources of information to determine occurrences of threatened or endangered species on the property and their habitat requirements.</i></p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p>SS, Standard 8, PM 8.2: <i>Landowner or designated representative shall monitor forest product harvests and other management activities to ensure they conform to their objectives.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The cycle of inventory and planning, implementation, monitoring and evaluation is inherently linked to the landowner's objective-setting and the incident forest management plan required by the SS.</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;	Y	<p>SS, Standard 1: <i>Commitment to Practicing Sustainable Forestry. Landowner demonstrates commitment to forest health and sustainability by developing a forest management plan, implementing sustainable practices, and seeking opportunities to expand their knowledge and understanding of sustainable forest management.</i></p> <p>Conclusion: Conformity</p> <p>Justification: Concerning individual certificate holders, the SS reflects the requirement of the PEFC ST 1003:2018. Concerning IMGs, the conformity with this benchmark is assessed in the <i>ATFS PEFC Checklist Group Forest Management</i>, section 5.2.1 a.</p>
b) to continuously improve the sustainable forest management system.	Y	<p>SS, Standards Prologue: <i>The American Forest Foundation's (AFF) 2021 Standards of Sustainability for Forest Certification (Standards) promote the health and sustainability of America's family forests. These Standards are designed as a tool to help woodland owners be effective stewards of the land as they adaptively manage renewable resources; promote environmental, economic and social benefits; and work to increase public understanding of sustainable forestry.</i></p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p>ERGC, Landowner Requirements for ATFS Certification: ... <i>The landowner(s) demonstrates proactive forest management involvement. ... The landowner(s) is engaged in active outreach efforts or can contribute to the effort. There are several ways that landowners can participate in outreach efforts. These include hosting forest-related tours on their property; joining a national, regional or local forestry or landowner association; supporting legislation that promotes private forest health and viability; supporting research that enhances the knowledge and practice of forest management on private forests; writing for publications in support of sustainable forestry on private lands; donating resources to these, and similar, forestry and forest landowner initiatives.</i></p> <p>SS, Standard 1, PM 1.1, Indicator (I) 1.1.1: <i>Management plan shall be active, adaptive and embody the landowner's current objectives, remain appropriate for the land certified and reflect the current state of knowledge about natural resources and sustainable forest management.</i></p> <p>Conclusion: Conformity</p> <p>Justification: Concerning individual certificate holders, the SS and the ERGC reflect commitment to continuously improve the forest management system as per the PEFC ST 1003:2018 requirement. Concerning IMGs, the conformity with this benchmark is assessed in the <i>ATFS PEFC Checklist Group Forest Management</i>, section 5.2.1 c.</p>
5.2 The standard requires that this commitment shall be publicly available.	y	<p>SS, Standard 1: <i>Commitment to Practicing Sustainable Forestry. Landowner demonstrates commitment to forest health and sustainability by developing a forest management plan, implementing sustainable practices, and seeking opportunities to expand their knowledge and understanding of sustainable forest management.</i></p> <p>ERGC, Public Summaries of Forest Management Plans: <i>Upon formal request, responsible ATFS representatives, IMG organizations and individual third-party certificate holders shall make available to interested parties the following information:</i></p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p><i>For individual certificate holders, the landowner shall provide a summary of the management plan included in the public audit summary compiled by the Certification Body, omitting proprietary information and other confidential information;</i></p> <p><i>For IMGs, the IMG Organization shall provide: 1) a summary of the AFF Standard required components of the management plans of IMG members' properties, and 2) summaries of the group members' management plans reviewed by the certification body and available in the public audit summary, omitting personally identifiable information, proprietary information and other confidential information; ...</i></p> <p>Conclusion: Conformity</p> <p>Justification: Concerning individual certificate holders, the landowner's commitment to comply with the sustainable forest management standard and other applicable requirements of the certification system is manifested in the forest management plan required by the SS.</p> <p>Concerning IMGs, the conformity with this benchmark is assessed in the <i>ATFS PEFC Checklist Group Forest Management</i>, section 5.2.2.</p> <p>Comment: The PEFC ST 1001:2017 defines <i>publicly available</i> as <i>generally accessible to the interested public in any form and without the need for a request</i>. However, providing the required information per request is a relevant means of making forest management plan contents public.</p>
5.3 The standard requires that responsibilities for sustainable forest management shall be clearly defined and assigned.	y	<p>SS, Standards Prologue: <i>The Standards are used by a wide range of people. Landowners use the Standards to guide their management. Qualified natural resource professionals use the Standards to support and inform landowners in developing management plans and implementing sustainable forest management on the ground. Qualified ATFS inspectors and group managers use the Standards to conduct field inspections and management plan evaluations to determine conformance that qualifies</i></p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p><i>a property for certification. Finally, third-party assessors review operations and management plans to verify conformance with the Standards, as prescribed by ATFS policies and procedures.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SS provide a general description for different roles and responsibilities for the different user groups of the standards. Additionally, the SS assign specific responsibilities in relation to implementation of multiple individual standards (e.g. PM 1.1, PM 2.1, PM 4.1, PM 4.2, I 5.1.1, I 7.1.1, PM 8.2).</p>
6. Planning		
6.1 Actions to address risks and opportunities		
6.1.1 The standard requires that the organisation shall consider risks and opportunities concerning compliance with the requirements for sustainable forest management. Size and scale of the operations of the organisation shall be considered.	Y	<p>SS, Standard 1, PM 1.1, I 1.1.1: <i>Management plan shall be active, adaptive and embody the landowner's current objectives, remain appropriate for the land certified and reflect the current state of knowledge about natural resources and sustainable forest management.</i></p> <p>SS, Standard 1, PM 1.1, I 1.1.2: <i>Management plans shall describe current forest conditions, landowner's current objectives, management activities aimed at achieving landowner's objectives, document a feasible strategy for activity implementation and include a map accurately depicting significant forest-related resources.</i></p> <p><i>The forest management plan shall demonstrate consideration of the following resource elements: forest health, soil, water, wood and fiber production, threatened or endangered species, special sites, invasive species and forests of recognized importance. Where present and relevant to the property, the plan shall describe management activities related to these resource elements.</i></p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p><i>Where present, relevant to the property and consistent with landowner's objectives, the plan preparer should consider, describe and evaluate the following resource elements: fire, wetlands, desired species, recreation, conversion, forest aesthetics, biomass and carbon.</i></p> <p>Conclusion: Conformity</p> <p>Justification: Concerning individual certificate holders, the requirements placed for management plans as per the SS necessitate identification of risks and opportunities involved in sustainable forest management compliance, being comparable with the requirement of the PEFC ST 1003:2018. Concerning IMGs, the internal audit stipulated by the IMG standard practically meets the requirement of the PEFC ST 1003:2018.</p>
6.1.2 The standard requires that inventory and mapping of forest resources shall be established and maintained, adequate to local and national conditions and in correspondence with the requirements described in this international benchmark standard.	Y	<p>SS, Standard 1, PM 1.1, I 1.1.2: <i>Management plans shall describe current forest conditions, landowner's current objectives, management activities aimed at achieving landowner's objectives, document a feasible strategy for activity implementation and include a map accurately depicting significant forest-related resources. ...</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SS is in line with the PEFC ST 1003:2018.</p>
6.2 Management plan		
6.2.1 The standard requires that management plans shall be:		
a) elaborated and periodically updated or continually adjusted;	Y	<p>SS, Standard 1, PM 1.1, I 1.1.1: <i>Management plan shall be active, adaptive and embody the landowner's current objectives, remain appropriate for the land certified and reflect the current state of knowledge about natural resources and sustainable forest management.</i></p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		Conclusion: Conformity Justification: The SS is in line with the PEFC ST 1003:2018.
b) appropriate to the size and use of the forest area;	Y	SS, Standard 1, PM 1.1: <i>Landowner shall have and implement a written forest management plan consistent with the size of the forest and the scale and intensity of the forest activities.</i> Conclusion: Conformity Justification: The SS is in line with the PEFC ST 1003:2018.
c) based on applicable local, national and international legislation as well as existing land-use or other official plans; and	Y	SS, Standard 1, PM 1.1, I 1.1.1: <i>Management plan shall be active, adaptive and embody the landowner's current objectives, remain appropriate for the land certified and reflect the current state of knowledge about natural resources and sustainable forest management.</i> SS, Standard 2, PM 2.1, I 2.1.1: <i>Landowner shall comply with all relevant federal, state, county and municipal laws, regulations and ordinances governing forest management activities.</i> Conclusion: Conformity Justification: The SS is in line with the PEFC ST 1003:2018.
d) adequately covering forest resources.	Y	SS, Standard 1, PM 1.1, I 1.1.2: <i>Management plans shall describe current forest conditions, landowner's current objectives, management activities aimed at achieving landowner's objectives, document a feasible strategy for activity implementation and include a map accurately depicting significant forest-related resources.</i> <i>The forest management plan shall demonstrate consideration of the following resource elements: forest health, soil, water, wood and fiber production, threatened or endangered species, special sites, invasive species and forests of recognized</i>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p><i>importance. Where present and relevant to the property, the plan shall describe management activities related to these resource elements.</i></p> <p><i>Where present, relevant to the property and consistent with landowner's objectives, the plan preparer should consider, describe and evaluate the following resource elements: fire, wetlands, desired species, recreation, conversion, forest aesthetics, biomass and carbon.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SS is in line with the PEFC ST 1003:2018.</p>
6.2.2 The standard requires that management plans shall take into account the different uses or functions of the managed forest area.	Y	<p>SS, Standard 1, PM 1.1, I 1.1.2: ...<i>The forest management plan shall demonstrate consideration of the following resource elements: forest health, soil, water, wood and fiber production, threatened or endangered species, special sites, invasive species and forests of recognized importance. Where present and relevant to the property, the plan shall describe management activities related to these resource elements.</i></p> <p><i>Where present, relevant to the property and consistent with landowner's objectives, the plan preparer should consider, describe and evaluate the following resource elements: fire, wetlands, desired species, recreation, conversion, forest aesthetics, biomass and carbon.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SS is in line with the PEFC ST 1003:2018.</p>
6.2.3 The standard requires that management plans shall include at least a description of the current forest management unit, long-term objectives, and the average annual allowable cut, including its justification.	Y	<p>SS, Standard 1, PM 1.1, I 1.1.2: <i>Management plans shall describe current forest conditions, landowner's current objectives, management activities aimed at achieving landowner's objectives, document a feasible strategy for activity implementation and include a map accurately depicting significant forest-related resources.</i></p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p><i>The forest management plan shall demonstrate consideration of the following resource elements: forest health, soil, water, wood and fiber production, threatened or endangered species, special sites, invasive species and forests of recognized importance. Where present and relevant to the property, the plan shall describe management activities related to these resource elements. ...</i></p> <p>SS, Standard 8, PM 8.2, I 8.2.1: <i>Harvest, utilization, removal and other management activities shall be conducted in compliance with the landowner's objectives and to maintain the potential of the property to produce forest products and other benefits sustainably.</i></p> <p>Conclusion: Conformity</p> <p>Justification:</p> <p>The requirement to include the average annual allowable cut in the management plans is not stated explicitly in the SS, but the standards require true consideration of forest condition and management objectives in harvesting.</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.	Y	<p>SS, Standard 8, PM 8.2, I 8.2.1: <i>Harvest, utilization, removal and other management activities shall be conducted in compliance with the landowner's objectives and to maintain the potential of the property to produce forest products and other benefits sustainably.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SS is in line with the PEFC ST 1003:2018.</p>
6.2.5 The standard requires that management plans specify ways and means to minimise the risk of degradation and damage to forest ecosystems.	Y	<p>SS, Standard 1, PM 1.1, I 1.1.1: <i>Management plan shall be active, adaptive and embody the landowner's current objectives, remain appropriate for the land certified and reflect the current state of knowledge about natural resources and sustainable forest management.</i></p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p>SS, Standard 4, PM 4.1: <i>Landowner shall meet or exceed practices prescribed by state forestry best management practices (BMPs) that are applicable to the property.</i></p> <p>SS, Standard 8, PM 8.2, I 8.2.1: <i>Harvest, utilization, removal and other management activities shall be conducted in compliance with the landowner's objectives and to maintain the potential of the property to produce forest products and other benefits sustainably.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SS is in line with the PEFC ST 1003:2018.</p>
6.2.6 The standard requires that management plans shall take into account the results of scientific research.	Y	<p>SS, Standard 1, PM 1.1, I 1.1.1: <i>Management plan shall be active, adaptive and embody the landowner's current objectives, remain appropriate for the land certified and reflect the current state of knowledge about natural resources and sustainable forest management.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SS is in line with the PEFC ST 1003:2018.</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.	Y	<p>ERGC, Public Summaries of Forest Management Plans: <i>Upon formal request, responsible ATFS representatives, IMG organizations and individual third-party certificate holders shall make available to interested parties the following information:</i></p> <p><i>For individual certificate holders, the landowner shall provide a summary of the management plan included in the public audit summary compiled by the Certification Body, omitting proprietary information and other confidential information;</i></p> <p><i>For IMGs, the IMG Organization shall provide: 1) a summary of the AFF Standard required components of the management plans of IMG members' properties, and 2) summaries of the group members' management plans reviewed by the certification</i></p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p><i>body and available in the public audit summary, omitting personally identifiable information, proprietary information and other confidential information; ...</i></p> <p>Conclusion: Conformity</p> <p>Justification: The ERGC is in line with the PEFC ST 1003:2018.</p> <p>Comment: The PEFC ST 1001:2017 defines <i>publicly available</i> as <i>generally accessible to the interested public in any form and without the need for a request</i>. However, providing the required information per request is a relevant means of making forest management plan contents public.</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 made confidential by applicable legislation or for the protection of cultural sites or sensitive natural resource features.	Y	<p>ERGC, Public Summaries of Forest Management Plans: <i>Upon formal request, responsible ATFS representatives, IMG organizations and individual third-party certificate holders shall make available to interested parties the following information:</i></p> <p><i>For individual certificate holders, the landowner shall provide a summary of the management plan... omitting proprietary information and other confidential information;</i></p> <p><i>For IMGs, the IMG Organization shall provide... omitting personally identifiable information, proprietary information and other confidential information;</i></p> <p><i>For state Tree Farm programs, the American Tree Farm System shall provide... omitting personally identifiable information, proprietary information and other confidential information.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The ERGC is in line with the PEFC ST 1003:2018.</p>
6.3 Compliance requirements		



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
6.3.1 Legal compliance		
6.3.1.1 The standard requires that the organisation shall identify and have access to the legislation applicable to its forest management and determine how these compliance obligations apply to the organisation.	Y	<p>SS, Standard 2: <i>Compliance with Laws. Forest management activities comply with all relevant federal, state and local laws, regulations and ordinances.</i></p> <p>SS, Standard 2, PM 2.1: <i>Landowner shall comply with all relevant federal, state, county and municipal laws, regulations and ordinances governing forest management activities.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SS is in line with the PEFC ST 1003:2018.</p>
6.3.1.2 The standard requires that the organisation shall comply with applicable local, national and international legislation on forest management, including but not limited to forest management practices; nature and environmental protection; protected and endangered species; property, tenure and land-use rights for indigenous peoples, local communities or other affected stakeholders; health, labour and safety issues; anti-corruption and the payment of applicable royalties and taxes.	N	<p>SS, Standard 2: <i>Compliance with Laws. Forest management activities comply with all relevant federal, state and local laws, regulations and ordinances.</i></p> <p>SS, Standard 2, PM 2.1: <i>Landowner shall comply with all relevant federal, state, county and municipal laws, regulations and ordinances governing forest management activities.</i></p> <p>SS, Standard 5, PM 5.1: <i>Forest management activities shall protect habitats and communities occupied by threatened or endangered species as required by law.</i></p> <p>Conclusion: Minor non-conformity</p> <p>Justification: The SS makes no reference to international legislation. The issue is most prominent with questions related to land use rights and indigenous peoples (benchmark 6.3.2.2).</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.	N	<p>SS, Standard 2: <i>Compliance with Laws. Forest management activities comply with all relevant federal, state and local laws, regulations and ordinances.</i></p> <p>SS, Standard 2, PM 2.1: <i>Landowner shall comply with all relevant federal, state, county and municipal laws, regulations and ordinances governing forest management activities.</i></p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		Conclusion: Minor non-conformity Justification: Reference needs to be made to relevant U.S. anti-corruption legislation as per the requirement of benchmark 4.1 i.
6.3.1.4 The standard requires that measures shall be implemented to address protection of the forest from unauthorised activities such as illegal logging, illegal land use, illegally initiated fires, and other illegal activities.	Y	SS, Standard 2: <i>Compliance with Laws. Forest management activities comply with all relevant federal, state and local laws, regulations and ordinances.</i> SS, Standard 2, PM 2.1: <i>Landowner shall comply with all relevant federal, state, county and municipal laws, regulations and ordinances governing forest management activities.</i> SS, Standard 8, PM 8.2: <i>Landowner or designated representative shall monitor forest product harvests and other management activities to ensure they conform to their objectives.</i> Conclusion: Conformity Justification: The SS is in line with the PEFC ST 1003:2018.
6.3.2 Legal, customary and traditional rights related to the forest land		
6.3.2.1 The standard requires that property rights, tree ownership and land tenure arrangements shall be clearly defined, documented and established for the relevant management unit. Likewise, legal, customary and traditional rights related to the forest land shall be clarified, recognised and respected. Note: Guidance for the handling of tenure arrangements can be obtained from the FAO Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security.	N	SS, Glossary of Terms: <i>Landowner – Entity that holds title to the property to be certified.</i> SS, Standard 2, PM 2.1: <i>Landowner shall comply with all relevant federal, state, county and municipal laws, regulations and ordinances governing forest management activities.</i> ERGC, Landowner Requirements for ATFS Certification: <i>Landowner requirements may be delegated to a designated representative (family members, trustees, property managers, qualified natural resource professionals, lawyers or others) to implement the requirements of the program on behalf of the landowner. However, landowners must be engaged in the decision to pursue certification.</i>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p>ERGC, Leasing Agreements: <i>If a landowner retains control and decision-making authority over their forest management, in accordance with their objectives as reflected in their management plan, the land may be certified to that landowner. Lessees may not certify leased lands to the ATFS Standard.</i></p> <p>Conclusion: Minor non-conformity</p> <p>Justification: It is not described clearly how customary and traditional rights related to the forest land are clarified, recognised and respected in the context of the ATFS. If the national standard relies on U.S. legislation, reference needs to be made to relevant legislation defining and protecting property rights, including customary and traditional rights, as per the requirement of benchmark 4.1 i.</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>	<p>N</p>	<p>SS, Standard 2, PM 2.1: <i>Landowner shall comply with all relevant federal, state, county and municipal laws, regulations and ordinances governing forest management activities.</i></p> <p>SS, Standard 5, PM 5.4: <i>Where present, forest management activities should maintain or enhance forests of recognized importance. GUIDANCE: Forests of recognized importance (FORI) represent globally, regionally and nationally significant large landscape areas of exceptional ecological, social, cultural or biological values. These forests are evaluated at the landscape level, rather than the stand level and are recognized for a combination of unique values, rather than a single attribute. ...</i></p> <p>DAP Chapter 4: <i>Complaints. 4.6) All parties, including American Indian Tribes, shall have access to formal legal mechanisms to resolve disputes over landownership, tenure and use rights through applicable US federal law.</i></p> <p>DAP Chapter 7: <i>Complaint investigation and resolution process. 7.6) American Indian Tribes are federally recognized and afforded rights as sovereign nations. As such, American Indian Tribes act as their own negotiating bodies according to U.S. Federal law. If a formal complaint is received from an American Indian Tribe regarding legal ownership, tenure or long-term use rights to a property enrolled in the Tree Farm</i></p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p><i>Program, the President shall direct the involved parties to resolve their tenure and use rights through available legal channels. All ATFS certified forest owners are required to maintain documentation of legal ownership, tenure and long-term use rights to their property.</i></p> <p>Conclusion: Minor non-conformity</p> <p>Justification: It is not described clearly how customary and traditional rights related to the forest land are clarified, recognised and respected in the context of the ATFS. U.S. has not ratified ILO 169. The DAP focuses only on complaint resolution. If the national standard relies on U.S. legislation, reference needs to be made to relevant legislation as per the requirement of benchmark 4.1 i.</p>
<p>6.3.2.3 The standard requires that forest practices and operations shall respect human rights as defined by the Universal Declaration on Human Rights.</p>	<p>Y</p>	<p>SS, Standard 2, PM 2.1, I 2.1.1: <i>Landowner shall comply with all relevant federal, state, county and municipal laws, regulations and ordinances governing forest management activities.</i></p> <p>SS, Standard 8, PM 8.1, I 8.1.2: <i>Landowner should engage qualified contractors who carry appropriate insurance and comply with appropriate federal, state and local safety and fair labor rules, regulations and standard practices¹.</i></p> <p>¹<i>Auditors shall consider any complaints alleging violation of fair labor rules filed by workers or organized labor since the previous third-party certification audit. The auditor shall not take action on any labor issues pending in a formal grievance process or before federal, state or local agencies or the courts, however, until those processes are completed. Absent a record of documented complaints or noncompliances, contractors and managers are assumed to be in compliance with this indicator.</i></p> <p>GUIDANCE: <i>Landowners and designated representatives are encouraged to stipulate that contractors must be in compliance with all relevant laws and regulations. ...</i></p> <p>Conclusion: Conformity</p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		Justification: The SS does not explicitly mention human rights but promotes engaging qualified contractors and requires that landowners comply with all relevant legislation. The MoU ATFS–IAMAW safeguards that worker rights are respected in forestry operations under the ATFS.
6.3.3 Fundamental ILO conventions		
<p>6.3.3.1 The standard requires that forest practices and operations shall comply with fundamental ILO conventions.</p> <p>Note: In countries where the fundamental ILO conventions have been ratified, the requirements of 6.3.3.1 apply. In countries where a fundamental convention has not been ratified and its content is not covered by applicable legislation, specific requirements shall be included in the forest management standard.</p>	Y	<p>SS, Standard 2: <i>Compliance with Laws. Forest management activities comply with all relevant federal, state and local laws, regulations and ordinances.</i></p> <p>SS, Standard 2, PM 2.1: <i>Landowner shall comply with all relevant federal, state, county and municipal laws, regulations and ordinances governing forest management activities.</i></p> <p>SS, Standard 8, PM 8.1, I 8.1.2: <i>Landowner should engage qualified contractors who carry appropriate insurance and comply with appropriate federal, state and local safety and fair labor rules, regulations and standard practices.</i></p> <p>Conclusion: Conformity</p> <p>Justification: U.S. has only ratified two out of the eight fundamental conventions. The worker rights are protected by the federal and state legislation. The MoU ATFS–IAMAW seeks to address any gaps between the legislation and the requirements by ILO conventions, stating that IAMAW will <i>promote decent work which includes expansion of the rights and privileges set forth in the ILO core labor standards in those places where the government has not ratified these conventions in order to insure safe and decent work and a stable labor force for the forest products industry.</i></p>
6.3.4 Health, safety and working conditions		



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
6.3.4.1 The standard requires that forest operations shall be planned, organised and performed in a manner that enables health and accident risks to be identified and all reasonable measures to be applied to protect workers from work-related risks. Workers shall be informed about the risks involved with their work and about preventive measures.	Y	<p>SS, Standard 2, PM 2.1, I 2.1.1: <i>Landowner shall comply with all relevant federal, state, county and municipal laws, regulations and ordinances governing forest management activities.</i></p> <p>SS, Standard 8, PM 8.1, I 8.1.2: <i>Landowner should engage qualified contractors who carry appropriate insurance and comply with appropriate federal, state and local safety and fair labor rules, regulations and standard practices.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SS requires all relevant legislation and to be followed. The U.S. has a suite of laws governing health and safety issues in the workplace, the most prominent of which is the federal Occupational Safety and Health Act. OSHA's (http://www.osha.gov) mission is to assure the safety and health of America's workers by setting and enforcing standards; providing training, outreach, and education; establishing partnerships; and encouraging continual improvement in workplace safety and health.</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>	Y	<p>SS, Standard 2, PM 2.1, I 2.1.1: <i>Landowner shall comply with all relevant federal, state, county and municipal laws, regulations and ordinances governing forest management activities.</i></p> <p>SS, Standard 8, PM 8.1, I 8.1.2: <i>Landowner should engage qualified contractors who carry appropriate insurance and comply with appropriate federal, state and local safety and fair labor rules, regulations and standard practices.</i></p> <p>Conclusion: Conformity</p> <p>Justification: See benchmark 6.3.4.1 above.</p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
<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>	N	<p>SS, Standard 2, PM 2.1, I 2.1.1: <i>Landowner shall comply with all relevant federal, state, county and municipal laws, regulations and ordinances governing forest management activities.</i></p> <p>SS, Standard 8, PM 8.1, I 8.1.2: <i>Landowner should engage qualified contractors who carry appropriate insurance and comply with appropriate federal, state and local safety and fair labor rules, regulations and standard practices.</i></p> <p>Conclusion: Minor non-conformity</p> <p>Justification: The national standard relies on U.S. legislation; thus, reference needs to be made to relevant legislation as per the requirement of benchmark 4.1 i.</p>
<p>6.3.4.4 The standard requires that the organisation is committed to equal opportunities, non-discrimination and freedom from workplace harassment. Gender equality shall be promoted.</p>	Y	<p>Conclusion: Conformity</p> <p>Justification: According to the ATFS Volunteer No Harassment Policy, <i>the American Forest Foundation (AFF) is committed to ensuring a safe environment for all of our volunteers, partners, contractors, staff, landowners and others involved in the American Tree Farm System (ATFS). In support of this commitment and values shared by members of its community, AFF maintains and enforces a policy of zero tolerance of harassment of any kind, including harassment based upon an individual's race; color; creed; religion; genetic information; national origin; sex, sexual orientation (including gender identity); ancestry; marital status, pregnancy, childbirth, or related medical conditions; age; disability; or any other category protected under federal, state, or local law ("protected class").</i></p>
7. Support		
7.1 Resources		



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
7.1.1 The standard requires that the organisation shall determine and provide the resources needed for the establishment, implementation, maintenance and continual improvement of the sustainable forest management system.	Y	<p>SS, Standard 1, PM 1.1, Indicator (I) 1.1.1: <i>Management plan shall be active, adaptive and embody the landowner's current objectives, remain appropriate for the land certified and reflect the current state of knowledge about natural resources and sustainable forest management.</i></p> <p>Conclusion: Conformity</p> <p>Justification: Concerning individual certificate holders, the requirements placed by preparation of the management plan practically meet the requirement of the benchmark. Concerning IMGs, the conformity with this benchmark is assessed in the <i>ATFS PEFC Checklist Group Forest Management</i>, section 7.1.</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.	Y	<p>SS, Standard 2, PM 2.1, I 2.1.2: <i>Landowner should obtain advice from appropriate qualified natural resource professionals or qualified contractors who are trained in, and familiar with, relevant laws, regulations and ordinances.</i></p> <p>SS, Standard 5, PM 5.1, I 5.1.1: <i>Landowner shall periodically confer with natural resource agencies, state natural resource heritage programs, qualified natural resource professionals or other current sources of information to determine occurrences of threatened or endangered species on the property and their habitat requirements.</i></p> <p>SS, Standard 8, PM 8.1, I 8.1.1: <i>Landowner should use qualified natural resource professionals and qualified contractors when contracting for services.</i></p> <p>SS, Standard 8, PM 8.1, I 8.1.2: <i>Landowner should engage qualified contractors who carry appropriate insurance and comply with appropriate federal, state and local safety and fair labor rules, regulations and standard practices.</i></p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p>SS, Glossary of Terms: <i>Qualified contractor: Forest contractors who have completed recommended certification, licensing, training or education programs offered in their respective states.</i></p> <p><i>Qualified natural resource professional: A person who by training and experience can make forest management recommendations. Examples include foresters, soil scientists, hydrologists, forest engineers, forest ecologists, fishery and wildlife biologists or technically trained specialists in such fields.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SS promotes throughout the standards the use of qualified natural resource professionals and qualified contractors who have been provided with adequate training.</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.	Y	<p>ERGC, Landowner Requirements for ATFS Certification: ... <i>The landowner(s) is engaged in active outreach efforts or can contribute to the effort. There are several ways that landowners can participate in outreach efforts. These include hosting forest-related tours on their property; joining a national, regional or local forestry or landowner association; supporting legislation that promotes private forest health and viability; supporting research that enhances the knowledge and practice of forest management on private forests; writing for publications in support of sustainable forestry on private lands; donating resources to these, and similar, forestry and forest landowner initiatives.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The ERGC requires active outreach efforts from the ATFS landowners.</p>
7.4 Complaints		



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
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.	N	<p>DAP Chapter 2: <i>Scope</i>. This guideline details procedures for complaints and appeals to AFF which concern decisions and/or activities of the American Tree Farm System (ATFS), Independent Standard Review Panel (ISRP) and the National Standard Interpretation Committee (NSIC) and other programs which cannot be dealt with by accreditation or certification bodies.</p> <p>DAP Chapter 4: <i>Complaints</i>. 4.1) Complaints submitted to AFF shall be limited to concerns or issues regarding standard setting and other issues relating to AFF, ATFS and its state programs' compliance with the AFF's requirements for forest certification schemes or interpretations by the NSIC.</p> <p>DAP Chapter 5: <i>Appeals</i>. 5.1) Appeals submitted to AFF shall be limited to decisions eligible to be made by AFF.</p> <p>SS, Standard 8, PM 8.1, I 8.1.2 [footnote]: Auditors shall consider any complaints alleging violation of fair labor rules filed by workers or organized labor since the previous third-party certification audit. ...</p> <p>Conclusion: Minor non-conformity</p> <p>Justification: The DAP addresses complaint and dispute resolving mechanisms, but the topics defined by the benchmark are outside the scope of the DAP, as is the level at which the complaints and disputes are dealt with (the benchmark requirement is at the certificate holder level whereas the DAP concerns the system level). Standard 8 addresses the topic of work conditions from the audit point of view.</p>
7.5 Documented Information		
7.5.1 The standard requires that the organisation's management system shall include documented information required by the standard and determined by the organisation as being necessary	Y	<p>SS, Standard 1, Performance Measure (PM) 1.1: <i>Landowner shall have and implement a written forest management plan consistent with the size of the forest and the scale and intensity of the forest activities.</i></p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
for the effectiveness of the sustainable forest management system.		Conclusion: Conformity Justification: Concerning individual certificate holders, the PEFC ST 1003:2018 requirement is met through the requirements for a written management plan. Concerning IMGs, the requirements for documented information are placed by the section 5.1.1 f of the PEFC ST 1002:2018 and assessed for conformity in the <i>ATFS PEFC Checklist Group Forest Management</i> .
7.5.2 The standard requires that the documented information is relevant, and updated as appropriate, to the activities of the organisation.	Y	SS, Standard 1, PM 1.1, I 1.1.1: <i>Management plan shall be active, adaptive and embody the landowner's current objectives, remain appropriate for the land certified and reflect the current state of knowledge about natural resources and sustainable forest management.</i> Conclusion: Conformity Justification: Concerning individual certificate holders, the SS is in line with the PEFC ST 1003:2018. Concerning IMGs, assessment against this benchmark is addressed by sections 7.6 a and b of the <i>ATFS PEFC Checklist Group Forest Management</i> , both concluded with conformity.
8. Operation		
8.1 Criterion 1: Maintenance or appropriate enhancement of forest resources and their contribution to the global carbon cycle		
8.1.1 The standard requires that management shall aim to maintain or increase forests and their ecosystem services and maintain or enhance the economic, ecological, cultural and social values of forest resources.	Y	SS, Standard 4: <i>Air, Water and Soil Protection. Forest management practices maintain or enhance the ecosystems and ecosystem services provided by the forest, including air, water, soil and site quality.</i> SS, Standard 4, PM 4.1: <i>Landowner shall meet or exceed practices prescribed by state forestry best management practices (BMPs) that are applicable to the property.</i>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p>SS, Standard 5, PM 5.4: <i>Where present, forest management activities should maintain or enhance forests of recognized importance. GUIDANCE: Forests of recognized importance (FORI) represent globally, regionally and nationally significant large landscape areas of exceptional ecological, social, cultural or biological values. These forests are evaluated at the landscape level, rather than the stand level and are recognized for a combination of unique values, rather than a single attribute. ...</i></p> <p>SS, Standard 7, PM 7.1: <i>Forest management activities shall consider and maintain any special sites relevant on the property.</i></p> <p>SS, Standard 8, PM 8.2, I 8.2.1: <i>Harvest, utilization, removal and other management activities shall be conducted in compliance with the landowner's objectives and to maintain the potential of the property to produce forest products and other benefits sustainably.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SS is in line with the PEFC ST 1003:2018.</p>
<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.</p>	<p>Y</p>	<p>SS, Standard 4, PM 4.1: <i>Landowner shall meet or exceed practices prescribed by state forestry best management practices (BMPs) that are applicable to the property.</i></p> <p>SS, Standard 8, PM 8.2, I 8.2.1: <i>Harvest, utilization, removal and other management activities shall be conducted in compliance with the landowner's objectives and to maintain the potential of the property to produce forest products and other benefits sustainably.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SS is in line with the PEFC ST 1003:2018.</p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
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.	N	<p>SS, Standard 4, PM 4.1: <i>Landowner shall meet or exceed practices prescribed by state forestry best management practices (BMPs) that are applicable to the property.</i></p> <p>SS, Standard 8, PM 8.1, I 8.1.2: <i>Landowner should engage qualified contractors who carry appropriate insurance and comply with appropriate federal, state and local safety and fair labor rules, regulations and standard practices.</i></p> <p>Conclusion: Minor non-conformity</p> <p>Justification: The SS does not place a requirement of climate positive practices to management operations, and the reliance of the SS to BMPs is insufficient in verifying that this aspect is in line with the PEFC ST 1003:2018.</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	N	<p>ERGC, Acreage Limitations for ATFS Certification: ... <i>The evaluator is to deduct nonforest acres from the total acreage of the parcel.</i> ...</p> <p>SS, Standard 2: <i>Compliance with Laws. Forest management activities comply with all relevant federal, state and local laws, regulations and ordinances.</i></p> <p>Conclusion: Minor non-conformity</p> <p>Justification: The ERGC require the landowners' properties to be forest land. Conversion of the forest to another use would disqualify the property from ATFS eligibility and the property would be decertified. However, the SS does not directly address forest conversion. It is recommended that the SS is revised to accommodate standards for forest conversion in order to be explicitly in line with the PEFC ST 1003:2018 no-conversion requirement and its exceptions.</p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		Currently the ATFS relies largely on legislation on this matter; thus, reference needs to be made to relevant legislation as per the requirement of benchmark 4.1 i, including the legal definition of forest land.
b) entails a small proportion (no greater than 5 %) of forest type within the certified area; and	N	Conclusion: Minor non-conformity Justification: See 8.1.4 a
c) does not have negative impacts on ecologically important forest areas, culturally and socially significant areas, or other protected areas; and	N	Conclusion: Minor non-conformity Justification: See 8.1.4 a
d) does not destroy areas of significantly high carbon stock; and	N	Conclusion: Minor non-conformity Justification: See 8.1.4 a
e) makes a contribution to long-term conservation, economic, and social benefits.	N	Conclusion: Minor non-conformity Justification: See 8.1.4 a
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	N	SS, Standard 3, PM 3.1, I 3.1.1: <i>Reforestation or afforestation shall achieve adequate stocking of desired species reflecting the landowner's objectives, within five years after regeneration harvest, or an appropriate time frame for local conditions, or within a time interval as specified by applicable regulation.</i> GUIDANCE: ... <i>The landowner or their representative shall consult a qualified natural resource professional to ensure that afforestation does not have a negative ecological impact or degrade ecologically important non-forest ecosystems. Examples of ecologically important non-forest</i>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p><i>ecosystems in the United States include but are not limited to wetlands, native grasslands, peatlands, and shrublands. In practice, afforestation of ecologically important non-forest areas in the United States is uneconomical and therefore rare; most afforestation occurs on abandoned or reclaimed agricultural land which was forested prior to European settlement. Afforestation activities that negatively impact ecologically important non-forest areas are not eligible for certification.</i></p> <p>Conclusion: Minor non-conformity</p> <p>Justification: The SS prohibits any afforestation activities that negatively impact ecologically important non-forest areas. However, it lacks a comprehensive definition for negative impacts and has no consideration of the PEFC ST 1003:2018 exceptions related to the afforestation restriction.</p> <p>The draft SS of June 22, 2022, deviates herein from the last approved version of the SS (March 10, 2022). This assessment conclusion is thus dependable on the final approval of the draft SS.</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	N	<p>Conclusion: Minor non-conformity</p> <p>Justification: See 8.1.5 a</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	N	<p>Conclusion: Minor non-conformity</p> <p>Justification: See 8.1.5 a</p>
d) entails a small proportion of the ecologically important non-forest ecosystem managed by an organisation; and	N	<p>Conclusion: Minor non-conformity</p> <p>Justification: See 8.1.5 a</p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
e) does not destroy areas of significantly high carbon stock; and	N	Conclusion: Minor non-conformity Justification: See 8.1.5 a
f) makes a contribution to long-term conservation, economic, and social benefits.	N	Conclusion: Minor non-conformity Justification: See 8.1.5 a
8.1.6 The standard requires that if conversion of severely degraded forests to forest plantations is being considered, it must add economic, ecological, social and/or cultural value. Precondition of adding such value are circumstances where the conversion:		
a) is in compliance with national and regional policy and legislation applicable for land use and forest management and is a result of national or regional land-use planning governed by a governmental or other official authority; and	Y	<p>SS, Standard 2: <i>Compliance with Laws. Forest management activities comply with all relevant federal, state and local laws, regulations and ordinances.</i></p> <p>SS, Standard 3, PM 3.1, I 3.1.1: <i>Reforestation or afforestation shall achieve adequate stocking of desired species reflecting the landowner's objectives, within five years after regeneration harvest, or an appropriate time frame for local conditions, or within a time interval as specified by applicable regulation. GUIDANCE: The landowner or designated representative should ask his or her qualified natural resource professional or check with the state agency responsible for forestry assistance to find out if there is a reforestation law in place, and if so, to ensure compliance with it. ... A plantation may be established to add economic value and/or ecosystem services. ...</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SS allows plantation establishment for added economic value or ecosystem services, while they do not directly address conversion of degraded forests to forest plantations. Standard 2 requires that all relevant legislation is followed in the process as required by the benchmark.</p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
b) is established based on a decision-making basis where affected stakeholders have opportunities to contribute to the decision-making on conversion through transparent and participatory consultation processes; and	N	<p>Conclusion: Minor non-conformity</p> <p>Justification: The ATFS does not include a description of a stakeholder consultation process associated with conversion of degraded forests to forest plantations.</p>
c) has a positive impact on long-term carbon sequestration capacity of forest vegetation; and	Y	<p>SS, Standard 3, PM 3.1, I 3.1.1: <i>Reforestation or afforestation shall achieve adequate stocking of desired species reflecting the landowner's objectives, within five years after regeneration harvest, or an appropriate time frame for local conditions, or within a time interval as specified by applicable regulation. GUIDANCE: ... A plantation may be established to add economic value and/or ecosystem services. ...</i></p> <p>SS, Standard 8, PM 8.2, I 8.2.1: <i>Harvest, utilization, removal and other management activities shall be conducted in compliance with the landowner's objectives and to maintain the potential of the property to produce forest products and other benefits sustainably.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SS is in line with the PEFC ST 1003:2018.</p>
d) does not have negative impacts on ecologically important forest areas, culturally and socially significant areas, or other protected areas; and	Y	<p>SS, Standard 5, PM 5.4: <i>Where present, forest management activities should maintain or enhance forests of recognized importance. GUIDANCE: Forests of recognized importance (FORI) represent globally, regionally and nationally significant large landscape areas of exceptional ecological, social, cultural or biological values. These forests are evaluated at the landscape level, rather than the stand level and are recognized for a combination of unique values, rather than a single attribute. ...</i></p> <p>SS, Standard 7: <i>Protect Special Sites. Special sites are managed in ways that recognize their unique historical, archeological, cultural, geological, biological or ecological characteristics.</i></p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p>SS, Standard 7, PM 7.1: <i>Forest management activities shall consider and maintain any special sites relevant on the property.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SS is in line with the PEFC ST 1003:2018.</p>
e) safeguards protective functions of forests for society and other regulating or supporting ecosystem services; and	Y	<p>SS, Standard 1, PM 1.1, I 1.1.2: ... <i>The forest management plan shall demonstrate consideration of the following resource elements: forest health, soil, water, wood and fiber production, threatened or endangered species, special sites, invasive species and forests of recognized importance. Where present and relevant to the property, the plan shall describe management activities related to these resource elements.</i></p> <p><i>Where present, relevant to the property and consistent with landowner's objectives, the plan preparer should consider, describe and evaluate the following resource elements: fire, wetlands, desired species, recreation, conversion, forest aesthetics, biomass and carbon.</i></p> <p>SS, Standard 4: <i>Air, Water and Soil Protection. Forest management practices maintain or enhance the ecosystems and ecosystem services provided by the forest, including air, water, soil and site quality.</i></p> <p>SS, Standard 4, PM 4.1: <i>Landowner shall meet or exceed practices prescribed by state forestry best management practices (BMPs) that are applicable to the property.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SS is in line with the PEFC ST 1003:2018.</p>
f) safeguards socio-economic functions of forests, including the recreational function and aesthetic values of forests and other cultural services; and	Y	<p>SS, Standard 1, PM 1.1, I 1.1.2: ... <i>Where present, relevant to the property and consistent with landowner's objectives, the plan preparer should consider, describe and</i></p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p><i>evaluate the following resource elements: fire, wetlands, desired species, recreation, conversion, forest aesthetics, biomass and carbon.</i></p> <p>SS, Standard 5, PM 5.4: <i>Where present, forest management activities should maintain or enhance forests of recognized importance. GUIDANCE: Forests of recognized importance (FORI) represent globally, regionally and nationally significant large landscape areas of exceptional ecological, social, cultural or biological values. These forests are evaluated at the landscape level, rather than the stand level and are recognized for a combination of unique values, rather than a single attribute. ...</i></p> <p>SS, Standard 6: <i>Forest Aesthetics. Forest management activities recognize the value of forest aesthetics.</i></p> <p>SS, Standard 6, PM 6.1: <i>Landowner should manage the visual impacts of forest management activities consistent with landowner objectives, the size of the forest, the scale and intensity of forest management activities and the location of the property.</i></p> <p>SS, Standard 7: <i>Protect Special Sites. Special sites are managed in ways that recognize their unique historical, archeological, cultural, geological, biological or ecological characteristics.</i></p> <p>SS, Standard 7, PM 7.1: <i>Forest management activities shall consider and maintain any special sites relevant on the property.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SS is in line with the PEFC ST 1003:2018.</p>
g) has a land history providing evidence that the degradation is not the consequence of deliberate poor forest management practices; and	N	<p>Conclusion: Minor non-conformity</p> <p>Justification: The ATFS does not include assessment of causes of forest degradation in the context of the benchmark.</p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
h) is based on credible evidence demonstrating that the area is neither recovered nor in the process of recovery.	N	Conclusion: Minor non-conformity Justification: The ATFS does not include assessment of forest recovery status in the context of the benchmark.
8.2 Criterion 2: Maintenance of forest ecosystem health and vitality		
8.2.1 The standard requires that health and vitality of forest ecosystems shall be maintained or enhanced and degraded forest ecosystems shall be rehabilitated wherever and as far as economically feasible, by making best use of natural structures and processes and using preventive biological measures.	Y	<p>SS, Standard 1: <i>Commitment to Practicing Sustainable Forestry. Landowner demonstrates commitment to forest health and sustainability by developing a forest management plan, implementing sustainable practices, and seeking opportunities to expand their knowledge and understanding of sustainable forest management.</i></p> <p>SS, Standard 4, PM 4.2: <i>Landowner shall consider a range of forest management activities to control pests, pathogens and unwanted vegetation.</i></p> <p>SS, Standard 5, PM 5.3, I 5.3.1: <i>Landowner should make practical efforts to promote forest health, including prevention, control or response to disturbances such as wildland fire, invasive species and other pests, pathogens or unwanted vegetation, to achieve specific management objectives.</i></p> <p>Conclusion: Conformity Justification: The SS reflects the principles required by the PEFC ST 1003:2018.</p>
8.2.2 The standard requires that adequate genetic, species and structural diversity shall be encouraged or maintained to enhance the stability, vitality and resilience of the forests to adverse environmental factors and strengthen natural regulation mechanisms.	Y	<p>SS, Standard 5: <i>Forest management activities contribute to the conservation of biodiversity.</i></p> <p>SS, Standard 5: PM 5.1: <i>Forest management activities shall protect habitats and communities occupied by threatened or endangered species as required by law.</i></p> <p>SS, Standard 5, PM 5.1, Indicator 5.1.1: <i>Landowner shall periodically confer with natural resource agencies, state natural resource heritage programs, qualified natural resource</i></p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p><i>professionals or other current sources of information to determine occurrences of threatened or endangered species on the property and their habitat requirements.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SS is in line with the PEFC ST 1003:2018.</p>
8.2.3 The standard requires that use of fire shall be limited to regions where fire is an essential tool in forest management for regeneration, wildfire protection and habitat management or a recognized practice of indigenous peoples. In these cases adequate management and control measures shall be taken.	Y	<p>SS, Standard 4, PM 4.3: <i>When used, prescribed burns shall conform with landowner's objectives and all applicable rules, laws, and regulations.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SS is in line with the PEFC ST 1003:2018.</p>
8.2.4 The standard requires that appropriate forest management practices such as reforestation and afforestation with tree species and provenances that are suited to the site conditions or the use of tending, harvesting and transport techniques that minimise tree and/or soil damages shall be applied.	Y	<p>SS, Standard 3, PM 3.1, I 3.1.1: <i>Reforestation or afforestation shall achieve adequate stocking of desired species reflecting the landowner's objectives, within five years after regeneration harvest, or an appropriate time frame for local conditions, or within a time interval as specified by applicable regulation. GUIDANCE: ... For reforestation and afforestation, use of native and naturalized species and local provenances that are well-adapted to site conditions is preferred, where appropriate. ...</i></p> <p>SS, Standard 4, PM 4.1, I 4.1.1: <i>Landowner shall implement specific state forestry BMPs that are applicable to the property. GUIDANCE: When planning management activities that will cause any soil disturbance or require chemical application, the BMP manual for the state in which the property is located should be consulted and applicable BMP methods employed. ...</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SS is in line with the PEFC ST 1003:2018.</p> <p>Comment: It is recommended that the SS is revised to explicitly require the use of tree species and provenances that are suited to the site conditions.</p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
8.2.5 The standard requires that the indiscriminate disposal of waste on forest land shall be strictly avoided. Non-organic waste and litter shall be collected, stored in designated areas and removed in an environmentally-responsible manner. The spillage of oil or fuel during forest management operations shall be prevented. Emergency procedures for the minimisation of risk of environmental harm arising from the accidental spillage shall be in place.	Y	<p>SS, Standard 2: <i>Compliance with Laws. Forest management activities comply with all relevant federal, state and local laws, regulations and ordinances.</i></p> <p>SS, Standard 2, PM 2.1: <i>Landowner shall comply with all relevant federal, state, county and municipal laws, regulations and ordinances governing forest management activities.</i></p> <p>SS, Standard 4, PM 4.1: <i>Landowner shall meet or exceed practices prescribed by state forestry best management practices (BMPs) that are applicable to the property.</i></p> <p>SS, Standard 4, PM 4.1, I 4.1.1: <i>Landowner shall implement specific state forestry BMPs that are applicable to the property.</i></p> <p>Conclusion: Conformity</p> <p>Justification: State regulations in the U.S. address spillage of oil and disposal of waste. United States Environmental Protection Agency provides regulatory and guidance information on the topics:</p> <p>Waste disposal: https://www.epa.gov/regulatory-information-topic/regulatory-and-guidance-information-topic-waste</p> <p>Oil spills: https://www.epa.gov/oil-spills-prevention-and-preparedness-regulations</p>
8.2.6 The standard requires that integrated pest management, appropriate silviculture alternatives and other biological measures shall be preferred to minimise the use of pesticides.	Y	<p>SS, Standard 4, PM 4.2: <i>Landowner shall consider a range of forest management activities to control pests, pathogens and unwanted vegetation.</i></p> <p>SS, Standard 4, PM 4.2, I 4.2.1: <i>Landowner should evaluate alternatives to pesticides for the prevention or control of pests, pathogens and unwanted vegetation to achieve specific management objectives.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SS is in line with the PEFC ST 1003:2018.</p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
8.2.7 The standard requires that any use of pesticides is documented.	N	<p>SS, Standard 4, PM 4.2, I 4.2.2: <i>Pesticides used shall be approved by the Environmental Protection Agency (EPA) and applied, stored and disposed of in accordance with EPA-approved labels and by persons appropriately trained, licensed and supervised. GUIDANCE: ...Use of pesticides should be documented by the landowner or designated representative.</i></p> <p>Conclusion: Minor non-conformity</p> <p>Justification: Stating <i>should</i> instead of <i>shall</i>, the SS does not explicitly meet the PEFC ST 1003:2018 requirement on pesticide use documentation.</p>
8.2.8 The standard requires that the WHO Class 1A and 1B pesticides and other highly toxic pesticides shall be prohibited, except where no other viable alternative is available. Any exception to the usage of WHO Class 1A and 1B pesticides shall be defined in the national/regional standard.	Y	<p>SS, Standard 2, PM 2.1, I 2.1.1: <i>Landowner shall comply with all relevant federal, state, county and municipal laws, regulations and ordinances governing forest management activities.</i></p> <p>SS, Standard 4, PM 4.2, I 4.2.2: <i>Pesticides used shall be approved by the Environmental Protection Agency (EPA) and applied, stored and disposed of in accordance with EPA-approved labels and by persons appropriately trained, licensed and supervised</i></p> <p>Conclusion: Conformity</p> <p>Justification: EPA regulates pesticide use through the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA). WHO highly toxic pesticides are not approved for forestry uses in the U.S.</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.	Y	<p>SS, Standard 2, PM 2.1, I 2.1.1: <i>Landowner shall comply with all relevant federal, state, county and municipal laws, regulations and ordinances governing forest management activities.</i></p> <p>SS, Standard 4, PM 4.2, I 4.2.2: <i>Pesticides used shall be approved by the Environmental Protection Agency (EPA) and applied, stored and disposed of in</i></p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
Note: "Pesticides banned by international agreements" are defined in the Stockholm Convention on Persistent Organic Pollutants.		<p><i>accordance with EPA-approved labels and by persons appropriately trained, licensed and supervised</i></p> <p>Conclusion: Conformity</p> <p>Justification: EPA regulates pesticide use through the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA). Chlorinated hydrocarbons are not approved for forestry uses in the U.S.</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.	Y	<p>SS, Standard 4, PM 4.2, I 4.2.2: <i>Pesticides used shall be approved by the Environmental Protection Agency (EPA) and applied, stored and disposed of in accordance with EPA-approved labels and by persons appropriately trained, licensed and supervised.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SS requirement to abide with the EPA regulations fulfils the PEFC ST 1003:2018 requirements.</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.	Y	<p>SS, Standard 2, PM 2.1: <i>Landowner shall comply with all relevant federal, state, county and municipal laws, regulations and ordinances governing forest management activities.</i></p> <p>SS, Standard 4: <i>Forest management practices maintain or enhance the ecosystems and ecosystem services provided by the forest, including air, water, soil and site quality.</i></p> <p>SS, Standard 4, PM 4.1: <i>Landowner shall meet or exceed practices prescribed by state forestry best management practices (BMPs) that are applicable to the property.</i></p> <p>GUIDANCE: <i>Compliance with all state forestry BMPs that apply to elements such as air, water, soil and site quality are required on all ATFS certified properties, even if voluntary in the state of practice. ...</i></p> <p>Conclusion: Conformity</p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		Justification: The SS stipulates maintaining or enhancing of ecosystem services, i.e. consideration of environment, in forest management practices. The SS also requires abidance to the national and state legislation and to the BMPs, which regulate the use of fertilizers.
8.3 Criterion 3: Maintenance and encouragement of productive functions of forests (wood and non-wood)		
8.3.1 The standard requires that the capability of forests to produce a range of wood and non-wood forest products and services on a sustainable basis shall be maintained.	Y	<p>SS, Standard 1: <i>Commitment to Practicing Sustainable Forestry. Landowner demonstrates commitment to forest health and sustainability by developing a forest management plan, implementing sustainable practices, and seeking opportunities to expand their knowledge and understanding of sustainable forest management.</i></p> <p>SS, Standard 8, PM 8.2, I 8.2.1: <i>Harvest, utilization, removal and other management activities shall be conducted in compliance with the landowner's objectives and to maintain the potential of the property to produce forest products and other benefits sustainably.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SS is in line with the PEFC ST 1003:2018.</p>
8.3.2 The standard requires that sound economic performance shall be pursued, taking into account possibilities for new markets and economic activities in connection with all relevant goods and services of forests.	Y	<p>SS, Standard 1, PM 1.1: <i>Landowner shall have and implement a written forest management plan consistent with the size of the forest and the scale and intensity of the forest activities.</i></p> <p>SS, Standard 1, PM 1.1, I 1.1.1: <i>Management plan shall be active, adaptive and embody the landowner's current objectives, remain appropriate for the land certified and reflect the current state of knowledge about natural resources and sustainable forest management.</i></p> <p>SS, Standard 1, PM 1.1, I 1.1.2: <i>...The forest management plan shall demonstrate consideration of the following resource elements: forest health, soil, water, wood and</i></p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p><i>fiber production, threatened or endangered species, special sites, invasive species and forests of recognized importance. Where present and relevant to the property, the plan shall describe management activities related to these resource elements. ...</i></p> <p>SS, Standard 8, PM 8.2, I 8.2.1: <i>Harvest, utilization, removal and other management activities shall be conducted in compliance with the landowner's objectives and to maintain the potential of the property to produce forest products and other benefits sustainably.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SS meets the requirements of the PEFC ST 1003:2018.</p>
<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.</p>	<p>Y</p>	<p>SS, Standard 3, PM 3.1: <i>Reforestation or afforestation shall be achieved by a suitable process that ensures adequate stocking levels.</i></p> <p>SS, Standard 4: <i>Air, Water and Soil Protection. Forest management practices maintain or enhance the ecosystems and ecosystem services provided by the forest, including air, water, soil and site quality.</i></p> <p>SS, Standard 4, PM 4.1: <i>Landowner shall meet or exceed practices prescribed by state forestry best management practices (BMPs) that are applicable to the property.</i></p> <p>SS, Standard 8, PM 8.2, I 8.2.1: <i>Harvest, utilization, removal and other management activities shall be conducted in compliance with the landowner's objectives and to maintain the potential of the property to produce forest products and other benefits sustainably.</i></p> <p>Conclusion: Conformity</p> <p>Justification:</p> <p>The SS is in line with the PEFC ST 1003:2018.</p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
8.3.4 The standard requires that harvesting levels of both wood and non-wood forest products shall not exceed a rate that can be sustained in the long term, and optimum use shall be made of the harvested products.	Y	<p>SS, Standard 8, PM 8.2, I 8.2.1: <i>Harvest, utilization, removal and other management activities shall be conducted in compliance with the landowner's objectives and to maintain the potential of the property to produce forest products and other benefits sustainably.</i></p> <p>Conclusion: Conformity</p> <p>Justification: Concerning the harvesting levels the SS is in line with the PEFC ST 1003:2018.</p> <p>Note: The use of harvested products is not within the scope of the ATFS.</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.	Y	<p>SS, Standard 4, PM 4.1, I 4.1.1: <i>Landowner shall implement specific state forestry BMPs that are applicable to the property. GUIDANCE: ... Examples of activities requiring BMP application:</i></p> <ul style="list-style-type: none"> • <i>Harvest planning – including block design, haul roads, skidder trails, stream crossings and truck-loading areas</i> • <i>Reforestation design – mechanical or chemical site preparation, machine or hand planting</i> • <i>Construction of new roads and maintenance of existing roads</i> • <i>Prescribed burning plans – fire lane construction, smoke management, agency notification</i> <p>Conclusion: Conformity</p> <p>Justification: The SS meets the requirements of the PEFC ST 1003:2018 through abidance to the state BMPs.</p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
8.4 Criterion 4: Maintenance, conservation and appropriate enhancement of biological diversity in forest ecosystems		
8.4.1 The standard requires that management planning shall aim to maintain, conserve or enhance biodiversity on landscape, ecosystem, species and genetic levels.	Y	<p>SS, Standard 1, PM 1.1, I 1.1.1: <i>Management plan shall be active, adaptive and embody the landowner's current objectives, remain appropriate for the land certified and reflect the current state of knowledge about natural resources and sustainable forest management.</i></p> <p>SS, Standard 1, PM 1.1, I 1.1.2: <i>... The forest management plan shall demonstrate consideration of the following resource elements: forest health, soil, water, wood and fiber production, threatened or endangered species, special sites, invasive species and forests of recognized importance. Where present and relevant to the property, the plan shall describe management activities related to these resource elements. ...</i></p> <p>SS, Standard 5: <i>Fish, Wildlife, Biodiversity and Forest Health. Forest management activities contribute to the conservation of biodiversity.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SS meets the requirements of the PEFC ST 1003:2018.</p>
<p>8.4.2 The standard requires that inventory, mapping and planning of forest resources shall identify, protect, conserve or set aside ecologically important forest areas.</p> <p>Note: This does not prohibit forest management activities that do not damage the important ecologic values of those biotopes.</p>	Y	<p>SS, Standard 1, PM 1.1, I 1.1.2: <i>Management plans shall describe current forest conditions, landowner's current objectives, management activities aimed at achieving landowner's objectives, document a feasible strategy for activity implementation and include a map accurately depicting significant forest-related resources.</i></p> <p><i>The forest management plan shall demonstrate consideration of the following resource elements: forest health, soil, water, wood and fiber production, threatened or endangered species, special sites, invasive species and forests of recognized importance. Where present and relevant to the property, the plan shall describe management activities related to these resource elements. ...</i></p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p>SS, Standard 5, PM 5.4: <i>Where present, forest management activities should maintain or enhance forests of recognized importance.</i></p> <p>SS, Standard 7, PM 7.1: <i>Forest management activities shall consider and maintain any special sites relevant on the property.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SS is in line with the PEFC ST 1003:2018.</p>
<p>8.4.3 The standard requires that protected, threatened and endangered plant and animal species shall not be exploited for commercial purposes. Where necessary, measures shall be taken for their protection and, where relevant, to increase their population.</p> <p>Note: The requirement does not preclude trade according to CITES requirements.</p>	Y	<p>SS, Standard 5, PM 5.1: <i>Forest management activities shall protect habitats and communities occupied by threatened or endangered species as required by law.</i></p> <p>SS, Standard 5, PM 5.1, I 5.1.2: <i>Forest management activities shall incorporate measures to protect identified threatened or endangered species on the property.</i></p> <p>SS, Standard 5, PM 5.4: <i>Where present, forest management activities should maintain or enhance forests of recognized importance.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SS is in line with the PEFC ST 1003:2018.</p>
<p>8.4.4 The standard requires that successful regeneration shall be ensured through natural regeneration or planting that is adequate to ensure the quantity and quality of the forest resources.</p>	Y	<p>SS, Standard 3, PM 3.1: <i>Reforestation or afforestation shall be achieved by a suitable process that ensures adequate stocking levels.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SS is in line with the PEFC ST 1003:2018.</p>
<p>8.4.5 The standard requires that for reforestation and afforestation origins of native species that are well-adapted to site conditions shall be preferred. Only those introduced species,</p>	N	<p>SS, Standard 3, PM 3.1, I 3.1.1: <i>Reforestation or afforestation shall achieve adequate stocking of desired species reflecting the landowner's objectives, within five years after regeneration harvest, or an appropriate time frame for local conditions, or within a time</i></p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
<p>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>		<p><i>interval as specified by applicable regulation. GUIDANCE: ... For reforestation and afforestation, use of native and naturalized species and local provenances that are well-adapted to site conditions is preferred, where appropriate. A plantation may be established to add economic value and/or ecosystem services. If nonnative species are selected, landowner should consult or seek guidance from qualified natural resource professionals, such as agencies, academic institutions or professional associations, to ensure that potential negative impacts on the ecosystem and on the genetic integrity of native species and local provenances have been evaluated, and to determine whether negative impacts can be avoided or minimized. Landowners should avoid use of invasive species in reforestation and afforestation efforts. ...</i></p> <p>Conclusion: Minor non-conformity</p> <p>Justification: The SS does not explicitly meet the PEFC ST 1003:2018 requirement on only using such introduced species whose impacts on the ecosystem and on the genetic integrity of native species and local provenances have been scientifically evaluated. The aspect relies on a landowner's voluntary consultation with a qualified professional.</p>
<p>8.4.6 The standard requires that afforestation, reforestation and other tree planting activities that contribute to the improvement and restoration of ecological connectivity shall be promoted.</p>	<p>Y</p>	<p>SS, Standard 3, PM 3.1, I 3.1.1: <i>Reforestation or afforestation shall achieve adequate stocking of desired species reflecting the landowner's objectives, within five years after regeneration harvest, or an appropriate time frame for local conditions, or within a time interval as specified by applicable regulation.</i></p> <p>SS, Standard 5: <i>Forest management activities contribute to the conservation of biodiversity.</i></p> <p>SS, Standard 5, PM 5.4: <i>Where present, forest management activities should maintain or enhance forests of recognized importance.</i></p> <p>SS, Standard 5, PM 5.4, I 5.4.1: <i>Appropriate to the scale and intensity of the situation, forest management activities should incorporate measures to contribute to the</i></p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p><i>conservation of identified forests of recognized importance. GUIDANCE: Landowners or designated representatives who have identified some or all of their forest property as part of a FORI should delineate the area on the maps associated with the management plan. Management activities on or adjacent to an identified FORI should seek to contribute to or support the values that led to the designation of the area. For family landowners, a more likely scenario is that their property is adjacent to a state or federally protected area and identified as a FORI at a landscape scale. Landowners should consider the impact to a neighboring FORI and opportunities to support consideration of specific values or attributes when planning and implementing activities on their forest property....</i></p> <p>Conclusion: Conformity</p> <p>Justification: The issue of ecological connectivity is difficult to implement in private small-scale forestry, but the requirements and guidelines set by the SS practically address it. This is most prominent with the guidelines related to FORIs.</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>	Y	<p>Standard 3, PM 3.1, I 3.1.1: <i>Reforestation or afforestation shall achieve adequate stocking of desired species reflecting the landowner's objectives, within five years after regeneration harvest, or an appropriate time frame for local conditions, or within a time interval as specified by applicable regulation. GUIDANCE: ... Use of genetically modified trees is limited to very specific applications of species restoration, in accordance with federal regulations. As such, use of genetically modified trees by family landowners in the US is likely to be extremely low during the implementation period of ATFS 2021 Standards. However, use of genetically modified trees is not supported under these standards, reflecting conformance with PEFC requirements, which endorses the ATFS certification program. ...</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SS is in line with the PEFC ST 1003:2018.</p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
8.4.8 The standard requires that a diversity of both horizontal and vertical structures and the diversity of species such as mixed stands shall be promoted, where appropriate. The practices shall also aim to maintain or restore landscape diversity.	Y	<p>SS, Standard 5: <i>Fish, Wildlife, Biodiversity and Forest Health. Forest management activities contribute to the conservation of biodiversity.</i></p> <p>SS, Standard 5, PM 5.4: <i>Where present, forest management activities should maintain or enhance forests of recognized importance. GUIDANCE: Forests of recognized importance (FORI) represent globally, regionally and nationally significant large landscape areas of exceptional ecological, social, cultural or biological values. These forests are evaluated at the landscape level, rather than the stand level and are recognized for a combination of unique values, rather than a single attribute. ...</i></p> <p>Conclusion: Conformity</p> <p>Justification: Promotion of biodiversity is the key content of Standard 5 of the SS, which is in line with the PEFC ST 1003:2018 requirement.</p>
8.4.9 The standard requires that traditional management practices that create valuable ecosystems on appropriate sites shall be supported, where appropriate.	Y	<p>SS, Standard 5, PM 5.4: <i>Where present, forest management activities should maintain or enhance forests of recognized importance. GUIDANCE: Forests of recognized importance (FORI) represent globally, regionally and nationally significant large landscape areas of exceptional ecological, social, cultural or biological values. These forests are evaluated at the landscape level, rather than the stand level and are recognized for a combination of unique values, rather than a single attribute. ...</i></p> <p>Conclusion: Conformity</p> <p>Justification: Valuable ecosystems created by traditional management practices can be considered as forests of recognized importance, addressed by the PM 5.4 of the SS.</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	Y	<p>SS, Standard 5: <i>Fish, Wildlife, Biodiversity and Forest Health. Forest management activities contribute to the conservation of biodiversity.</i></p> <p>SS, Standard 8, PM 8.2, I 8.2.1: <i>Harvest, utilization, removal and other management activities shall be conducted in compliance with the landowner's objectives and to</i></p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
measures shall be taken to maintain or improve biological diversity.		<p><i>maintain the potential of the property to produce forest products and other benefits sustainably.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SS are in line with the PEFC ST 1003:2018.</p>
<p>8.4.11 The standard requires that infrastructure shall be planned and constructed in a way that minimizes damage to ecosystems, especially to rare, sensitive or representative ecosystems and genetic reserves, and that takes threatened or other key species – in particular their migration patterns – into consideration.</p>	Y	<p>SS, Standard 4, PM 4.1: <i>Landowner shall meet or exceed practices prescribed by state forestry best management practices (BMPs) that are applicable to the property.</i></p> <p>SS, Standard 4, PM 4.1, I 4.1.1: <i>Landowner shall implement specific state forestry BMPs that are applicable to the property.</i> GUIDANCE: ... <i>Examples of activities requiring BMP application:</i></p> <ul style="list-style-type: none"> • <i>Harvest planning – including block design, haul roads, skidder trails, stream crossings and truck-loading areas</i> • <i>Reforestation design – mechanical or chemical site preparation, machine or hand planting</i> • <i>Construction of new roads and maintenance of existing roads</i> • <i>Prescribed burning plans – fire lane construction, smoke management, agency notification</i> <p>SS, Standard 4, PM 4.1, I 4.1.2: <i>Landowner shall minimize road construction and other soil disturbances within riparian zones and wetlands.</i></p> <p>SS, Standard 5: <i>Fish, Wildlife, Biodiversity and Forest Health. Forest management activities contribute to the conservation of biodiversity.</i></p> <p>SS, Standard 5, PM 5.1: <i>Forest management activities shall protect habitats and communities occupied by threatened or endangered species as required by law.</i></p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p>SS, Standard 5, PM 5.4: <i>Where present, forest management activities should maintain or enhance forests of recognized importance.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SS is in line with the PEFC ST 1003:2018.</p>
8.4.12 The standard requires that, with due regard to management objectives, measures shall be taken to control the pressure of animal populations on forest regeneration and growth as well as on biodiversity.	Y	<p>SS, Standard 8, PM 8.2, I 8.2.1: <i>Harvest, utilization, removal and other management activities shall be conducted in compliance with the landowner's objectives and to maintain the potential of the property to produce forest products and other benefits sustainably.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SS is in line with the PEFC ST 1003:2018.</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.	Y	<p>SS, Standard 5, PM 5.1: <i>Forest management activities shall protect habitats and communities occupied by threatened or endangered species as required by law.</i></p> <p>SS, Standard 5, PM 5.1, I 5.1.1: <i>Landowner shall periodically confer with natural resource agencies, state natural resource heritage programs, qualified natural resource professionals or other current sources of information to determine occurrences of threatened or endangered species on the property and their habitat requirements.</i></p> <p>SS, Standard 7, PM 7.1: <i>Forest management activities shall consider and maintain any special sites relevant on the property.</i></p> <p>SS, Standard 7, PM 7.1, I 7.1.1: <i>Landowner shall make a reasonable effort to locate and protect special sites appropriate for the size of the forest and the scale and intensity of forest management activities.</i></p> <p>Conclusion: Conformity</p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		Justification: While the SS does not explicitly address fallen dead wood, hollow trees, old groves and rare tree species, the underlying intent of the PEFC ST 1003:2018 to safeguard the biodiversity related to these features is addressed in the SS listed above.
8.5 Criterion 5: Maintenance or appropriate enhancement of protective functions in forest management (notably soil and water)		
8.5.1 The standard requires that protective functions of forests for society, such as their potential role in erosion control, flood prevention, water purification, climate regulation, carbon sequestration and other regulating or supporting ecosystem services shall be maintained or enhanced.	Y	<p>SS, Standard 1, PM 1.1, I 1.1.1: <i>Management plan shall be active, adaptive and embody the landowner's current objectives, remain appropriate for the land certified and reflect the current state of knowledge about natural resources and sustainable forest management.</i></p> <p>SS, Standard 1, PM 1.1, I 1.1.2: <i>... The forest management plan shall demonstrate consideration of the following resource elements: forest health, soil, water, wood and fiber production, threatened or endangered species, special sites, invasive species and forests of recognized importance. Where present and relevant to the property, the plan shall describe management activities related to these resource elements.</i></p> <p><i>Where present, relevant to the property and consistent with landowner's objectives, the plan preparer should consider, describe and evaluate the following resource elements: fire, wetlands, desired species, recreation, conversion, forest aesthetics, biomass and carbon.</i></p> <p>SS, Standard 4: <i>Air, Water and Soil Protection. Forest management practices maintain or enhance the ecosystems and ecosystem services provided by the forest, including air, water, soil and site quality.</i></p> <p>SS, Standard 4, PM 4.1: <i>Landowner shall meet or exceed practices prescribed by state forestry best management practices (BMPs) that are applicable to the property.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SS is in line with the PEFC ST 1003:2018.</p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
<p>8.5.2 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.</p>	<p>Y</p>	<p>SS, Standard 1, PM 1.1, I 1.1.2: <i>Management plans shall describe current forest conditions, landowner's current objectives, management activities aimed at achieving landowner's objectives, document a feasible strategy for activity implementation and include a map accurately depicting significant forest-related resources.</i></p> <p><i>The forest management plan shall demonstrate consideration of the following resource elements: forest health, soil, water, wood and fiber production, threatened or endangered species, special sites, invasive species and forests of recognized importance. Where present and relevant to the property, the plan shall describe management activities related to these resource elements.</i></p> <p><i>Where present, relevant to the property and consistent with landowner's objectives, the plan preparer should consider, describe and evaluate the following resource elements: fire, wetlands, desired species, recreation, conversion, forest aesthetics, biomass and carbon.</i></p> <p>SS, Standard 4: <i>Air, Water and Soil Protection. Forest management practices maintain or enhance the ecosystems and ecosystem services provided by the forest, including air, water, soil and site quality.</i></p> <p>SS, Standard 4, PM 4.1: <i>Landowner shall meet or exceed practices prescribed by state forestry best management practices (BMPs) that are applicable to the property.</i></p> <p>SS, Standard 5, PM 5.4: <i>Where present, forest management activities should maintain or enhance forests of recognized importance.</i></p> <p>SS, Standard 7, PM 7.1: <i>Forest management activities shall consider and maintain any special sites relevant on the property.</i></p> <p>SS, Standard 8, PM 8.2, I 8.2.1: <i>Harvest, utilization, removal and other management activities shall be conducted in compliance with the landowner's objectives and to</i></p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p><i>maintain the potential of the property to produce forest products and other benefits sustainably.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SS is in line with the PEFC ST 1003:2018.</p>
8.5.3 The standard requires that special care shall be given to forestry operations on sensitive soils and erosion-prone areas as well as in areas where operations might lead to excessive erosion of soil into watercourses. Techniques applied and the machinery used shall be suitable for such areas. Special measures shall be taken to minimise the pressure of animal populations on these areas.	Y	<p>SS, Standard 4: <i>Air, Water and Soil Protection. Forest management practices maintain or enhance the ecosystems and ecosystem services provided by the forest, including air, water, soil and site quality.</i></p> <p>SS, Standard 4, PM 4.1: <i>Landowner shall meet or exceed practices prescribed by state forestry best management practices (BMPs) that are applicable to the property.</i></p> <p>SS, Standard 4, PM 4.1, I 4.1.2: <i>Landowner shall minimize road construction and other soil disturbances within riparian zones and wetlands.</i></p> <p>SS, Standard 8, PM 8.2, I 8.2.1: <i>Harvest, utilization, removal and other management activities shall be conducted in compliance with the landowner's objectives and to maintain the potential of the property to produce forest products and other benefits sustainably.</i></p> <p>Conclusion: Conformity</p> <p>Justification: Standard 4 of the SS focuses specifically on protection of air, water and soil. The SS is in line with the PEFC ST 1003:2018.</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	Y	<p>SS, Standard 4: <i>Air, Water and Soil Protection. Forest management practices maintain or enhance the ecosystems and ecosystem services provided by the forest, including air, water, soil and site quality.</i></p> <p>SS, Standard 4, PM 4.1: <i>Landowner shall meet or exceed practices prescribed by state forestry best management practices (BMPs) that are applicable to the property.</i></p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
water balance and water quality shall not be significantly affected by the operations.		<p>SS, Standard 4, PM 4.1, I 4.1.2: <i>Landowner shall minimize road construction and other soil disturbances within riparian zones and wetlands.</i></p> <p>SS, Standard 4, PM 4.2, I 4.2.2: <i>Pesticides used shall be approved by the Environmental Protection Agency (EPA) and applied, stored and disposed of in accordance with EPA-approved labels and by persons appropriately trained, licensed and supervised.</i></p> <p>SS, Standard 8, PM 8.2, I 8.2.1: <i>Harvest, utilization, removal and other management activities shall be conducted in compliance with the landowner's objectives and to maintain the potential of the property to produce forest products and other benefits sustainably.</i></p> <p>Conclusion: Conformity</p> <p>Justification: Standard 4 of the SS focuses specifically on protection of air, water and soil. The SS is in line with the PEFC ST 1003:2018.</p>
8.5.5 The standard requires that construction of roads, bridges and other infrastructure shall be carried out in a manner that minimises bare soil exposure, avoids the introduction of soil into watercourses and preserves the natural level and function of water courses and river beds. Proper road drainage facilities shall be installed and maintained.	Y	<p>SS, Standard 4, PM 4.1: <i>Landowner shall meet or exceed practices prescribed by state forestry best management practices (BMPs) that are applicable to the property.</i></p> <p>SS, Standard 4, PM 4.1, I 4.1.1: <i>Landowner shall implement specific state forestry BMPs that are applicable to the property.</i> GUIDANCE: ... Examples of activities requiring BMP application:</p> <ul style="list-style-type: none"> • <i>Harvest planning – including block design, haul roads, skidder trails, stream crossings and truck-loading areas</i> • <i>Reforestation design – mechanical or chemical site preparation, machine or hand planting</i> • <i>Construction of new roads and maintenance of existing roads</i>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p>• <i>Prescribed burning plans – fire lane construction, smoke management, agency notification</i></p> <p>SS, Standard 4, PM 4.1, I 4.1.2: <i>Landowner shall minimize road construction and other soil disturbances within riparian zones and wetlands.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SS is in line with the PEFC ST 1003:2018.</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.	Y	<p>SS, Standards Prologue: ... <i>These Standards are designed as a tool to help woodland owners be effective stewards of the land as they adaptively manage renewable resources; promote environmental, economic and social benefits; and work to increase public understanding of sustainable forestry. ...</i></p> <p>SS, Standard 1, PM 1.1, I 1.1.1: <i>Management plan shall be active, adaptive and embody the landowner's current objectives, remain appropriate for the land certified and reflect the current state of knowledge about natural resources and sustainable forest management.</i></p> <p>SS, Standard 5, PM 5.4: <i>Where present, forest management activities should maintain or enhance forests of recognized importance. GUIDANCE: Forests of recognized importance (FORI) represent globally, regionally and nationally significant large landscape areas of exceptional ecological, social, cultural or biological values. ...</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SS is in line with the PEFC ST 1003:2018.</p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
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.	Y	<p>SS, Standard 1, PM 1.1, I 1.1.2: <i>Management plans shall describe current forest conditions, landowner's current objectives, Where present, relevant to the property and consistent with landowner's objectives, the plan preparer should consider, describe and evaluate the following resource elements: fire, wetlands, desired species, recreation, conversion, forest aesthetics, biomass and carbon.</i></p> <p>Conclusion: Conformity</p> <p>Justification: Public access to the property needs to pay respect to the ownership rights as per the PEFC ST 1003:2018 requirement, and as such it is dependable on the landowner's objectives. The SS hence enables adequate public access to forest according to the PEFC ST 1003:2018 requirement.</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.	Y	<p>SS, Standard 5, PM 5.4: <i>Where present, forest management activities should maintain or enhance forests of recognized importance. GUIDANCE: Forests of recognized importance (FORI) represent globally, regionally and nationally significant large landscape areas of exceptional ecological, social, cultural or biological values. ...</i></p> <p>SS, Standard 7: <i>Protect Special Sites. Special sites are managed in ways that recognize their unique historical, archeological, cultural, geological, biological or ecological characteristics.</i></p> <p>SS, Standard 7, PM 7.1: <i>Forest management activities shall consider and maintain any special sites relevant on the property.</i></p> <p>Conclusion: Conformity</p> <p>Justification: While the SS does not consider indigenous people directly, Standard 5 and Standard 7 generally fulfil the PEFC ST 1003:2018 requirement.</p>
8.6.4 The standard requires that management shall promote the long-term health and well-being of communities within or	Y	<p>SS, Standards Prologue: <i>... These Standards are designed as a tool to help woodland owners be effective stewards of the land as they adaptively manage renewable</i></p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
adjacent to the forest management area, where appropriate supported by engagement with local communities and indigenous peoples.		<p><i>resources; promote environmental, economic and social benefits; and work to increase public understanding of sustainable forestry. ...</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SS is in line with the PEFC ST 1003:2018.</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.	Y	<p>SS, Standard 1, PM 1.1, I 1.1.1: <i>Management plan shall be active, adaptive and embody the landowner's current objectives, remain appropriate for the land certified and reflect the current state of knowledge about natural resources and sustainable forest management.</i></p> <p>SS, Standard 8, PM 8.1: <i>Landowner should use qualified natural resource professionals and qualified contractors when contracting for services.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SS is in line with the PEFC ST 1003:2018.</p>
8.6.6 The standard requires that management shall give due regard to the role of forestry in local economies. Special consideration shall be given to new opportunities for training and employment of local people, including indigenous peoples.	Y	<p>SS, Standards Prologue: <i>... These Standards are designed as a tool to help woodland owners be effective stewards of the land as they adaptively manage renewable resources; promote environmental, economic and social benefits; and work to increase public understanding of sustainable forestry. ...</i></p> <p>SS, Standard 2, PM 2.1, I 2.1.2: <i>Landowner should obtain advice from appropriate qualified natural resource professionals or qualified contractors who are trained in, and familiar with, relevant laws, regulations and ordinances.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SS does not directly address training and employment opportunities of local people, but their approach is generally in line with the PEFC ST 1003:2018 requirement.</p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
8.6.7 The standard requires that forest management shall contribute to research activities and data collection needed for sustainable forest management or support relevant research activities carried out by other organisations, as appropriate.	Y	<p>SS, Standard 1, PM 1.1, I 1.1.1: <i>Management plan shall be active, adaptive and embody the landowner's current objectives, remain appropriate for the land certified and reflect the current state of knowledge about natural resources and sustainable forest management.</i></p> <p>ERGC, Landowner Requirements for ATFS Certification: ... <i>The landowner(s) is engaged in active outreach efforts or can contribute to the effort. There are several ways that landowners can participate in outreach efforts. These include hosting forest-related tours on their property; joining a national, regional or local forestry or landowner association; supporting legislation that promotes private forest health and viability; supporting research that enhances the knowledge and practice of forest management on private forests; writing for publications in support of sustainable forestry on private lands; donating resources to these, and similar, forestry and forest landowner initiatives.</i></p> <p>...</p> <p>Conclusion: Conformity</p> <p>Justification: The SS and the ERGC are in line with the PEFC ST 1003:2018.</p>
9. Performance evaluation		
9.1 Monitoring, measurement, analysis and evaluation		
9.1.1 The standard requires that monitoring of forest resources and evaluation of their management, including ecological, social and economic effects, shall be periodically performed, and results fed back into the planning process.	Y	<p>SS, Standard 1, PM 1.1, I 1.1.1: <i>Management plan shall be active, adaptive and embody the landowner's current objectives, remain appropriate for the land certified and reflect the current state of knowledge about natural resources and sustainable forest management.</i></p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p>SS, Standard 1, PM 1.1, I 1.1.3: <i>The Landowner should monitor for changes that could interfere with the management objectives as stated in management plan. GUIDANCE: ... Landowners are encouraged to update management plans based on monitoring.</i></p> <p>SS, Standard 8, PM 8.2: <i>Landowner or designated representative shall monitor forest product harvests and other management activities to ensure they conform to their objectives.</i></p> <p>Conclusion: Conformity</p> <p>Justification: Monitoring of forest resources and evaluation of their management as per the SS is based on professional judgement but practically required by the standards. Standard 1 requires the management plan to be active, adaptive, and embody the landowner's current objectives, which necessitates adequate monitoring of the forest resources. Standard 8 requires evaluation of forest management in view of the landowner's objectives that shall be stipulated in the management plan.</p>
<p>9.1.2 The standard requires that health and vitality of forests shall be periodically monitored, especially key biotic and abiotic factors that potentially affect health and vitality of forest ecosystems, such as pests, diseases, overgrazing and overstocking, fire, and damage caused by climatic factors, air pollutants or by forest management operations.</p>	<p>Y</p>	<p>SS, Standard 1, PM 1.1, I 1.1.2: <i>Management plans shall describe current forest conditions, landowner's current objectives, management activities aimed at achieving landowner's objectives, document a feasible strategy for activity implementation and include a map accurately depicting significant forest-related resources.</i></p> <p><i>The forest management plan shall demonstrate consideration of the following resource elements: forest health, soil, water, wood and fiber production, threatened or endangered species, special sites, invasive species and forests of recognized importance. Where present and relevant to the property, the plan shall describe management activities related to these resource elements.</i></p> <p>SS, Standard 1, PM 1.1, I 1.1.3: <i>The Landowner should monitor for changes that could interfere with the management objectives as stated in management plan.</i></p> <p>SS, Standard 5, PM 5.3, I 5.3.1: <i>Landowner should make practical efforts to promote forest health, including prevention, control or response to disturbances such as wildland</i></p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p><i>fire, invasive species and other pests, pathogens or unwanted vegetation, to achieve specific management objectives.</i></p> <p>SS, Standard 8, PM 8.2: <i>Landowner or designated representative shall monitor forest product harvests and other management activities to ensure they conform to their objectives.</i></p> <p>SS, Standard 8, PM 8.2, I 8.2.1: <i>Harvest, utilization, removal and other management activities shall be conducted in compliance with the landowner's objectives and to maintain the potential of the property to produce forest products and other benefits sustainably.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SS requires consideration of forest health in the management plan, and the management plan to be active, adaptive, and embody the landowner's current objectives, necessitating an adequate level of monitoring. Standard 8 requires evaluation of forest management and appliance of management practices that maintain sustainability of the site to produce forest products and other benefits.</p>
9.1.3 The standard requires that where it is the responsibility of the forest owner/manager and included in forest management, the use of non-wood forest products, including hunting and fishing, shall be regulated, monitored and controlled.	Y	<p>SS, Standard 8, PM 8.2, I 8.2.1: <i>Harvest, utilization, removal and other management activities shall be conducted in compliance with the landowner's objectives and to maintain the potential of the property to produce forest products and other benefits sustainably.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The SS is in line with the PEFC ST 1003:2018.</p>
9.1.4 The standard requires that working conditions shall be regularly monitored and adapted as necessary.	Y	<p>SS, Standard 2, PM 2.1, I 2.1.1: <i>Landowner shall comply with all relevant laws, regulations and ordinances and will correct conditions that led to adverse regulatory actions, if any.</i></p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p>SS, Standard 8, PM 8.1, I 8.1.2: <i>Landowner should engage qualified contractors who carry appropriate insurance and comply with appropriate federal, state and local safety and fair labor rules, regulations and standard practices.</i></p> <p>Conclusion: Conformity</p> <p>Justification: Working conditions in forestry in U.S. are regulated and monitored through the legislative framework, e.g. the federal Occupational Safety and Health Act of 1970 (https://www.osha.gov/laws-regs/oshact/completeoshact).</p>
9.2 Internal audit		
9.2.1 Objectives		
The standard requires that an internal audit programme at planned intervals shall provide information on whether the management system		
<p>a) conforms to</p> <ul style="list-style-type: none"> • the organisation's requirements for its management system; • the requirements of the national sustainable forest management standard 	N	<p>ERGC, Internal monitoring: <i>All certificate holders shall conduct annual internal audits sufficient to ensure conformance with the AFF Standards of Sustainability. Internal audits are defined as systematic, independent, documented process undertaken by the certificate holder (rather than a third-party auditor). Certificate holders shall plan, establish, implement, and maintain an audit program which includes the frequency, methods, responsibilities, planning requirements and reporting, all of which shall take into consideration the importance of the processes concerned and the results of previous audits.</i></p> <p>Conclusion: Minor non-conformity</p> <p>Justification: The ATFS requirements for the internal audit concerning individual certificate holders include inspection of conformity with the SS but omit inspection of conformity with their defined management systems.</p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p>The draft ERGC of June 22, 2022, deviates herein from the last approved version of the ERGC (March 10, 2022). This assessment conclusion is thus dependable on the final approval of the draft ERGC.</p> <p>Concerning IMGs, the conformity with this benchmark is assessed in the <i>ATFS PEFC Checklist Group Forest Management</i>, section 9.2.1.1 a.</p>
b) is effectively implemented and maintained.	N	<p>ERGC, Internal monitoring: <i>All certificate holders shall conduct annual internal audits sufficient to ensure conformance with the AFF Standards of Sustainability. Internal audits are defined as systematic, independent, documented process undertaken by the certificate holder (rather than a third-party auditor). Certificate holders shall plan, establish, implement, and maintain an audit program which includes the frequency, methods, responsibilities, planning requirements and reporting, all of which shall take into consideration the importance of the processes concerned and the results of previous audits.</i></p> <p>Conclusion: Minor non-conformity</p> <p>Justification: The ATFS requirements for the internal audit concerning individual certificate holders place no requirements for inspecting whether the organisation's management system is effectively implemented and maintained.</p> <p>The draft ERGC of June 22, 2022, deviates herein from the last approved version of the ERGC (March 10, 2022). This assessment conclusion is thus dependable on the final approval of the draft ERGC.</p> <p>Concerning IMGs, the conformity with this benchmark is assessed in the <i>ATFS PEFC Checklist Group Forest Management</i>, section 9.2.1.1 c.</p>
<p>9.2.2 Organisation</p> <p>The standard requires that the organisation shall:</p>		



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
a) plan, establish, implement and maintain an audit programme(s) including the frequency, methods, responsibilities, planning requirements and reporting, which shall take into consideration the importance of the processes concerned and the results of previous audits;	Y	<p>ERGC, Internal monitoring: ... <i>Certificate holders shall plan, establish, implement, and maintain an audit program which includes the frequency, methods, responsibilities, planning requirements and reporting, all of which shall take into consideration the importance of the processes concerned and the results of previous audits.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The ERGC is in line with the PEFC ST 1003:2018.</p> <p>The draft ERGC of June 22, 2022, deviates herein from the last approved version of the ERGC (March 10, 2022). This assessment conclusion is thus dependable on the final approval of the draft ERGC.</p> <p>Concerning IMGs, the conformity with this benchmark is assessed in the <i>ATFS PEFC Checklist Group Forest Management</i>, section 9.2.2 a.</p>
b) define the audit criteria and scope for each audit;	Y	<p>ERGC, Internal monitoring: ... <i>For individual third-party certificate holders and the AFF's national certificate for ATFS state programs, specific requirements include:</i></p> <p><i>definition of the audit criteria and scope for each audit</i></p> <p>Conclusion: Conformity</p> <p>Justification: The ERGC is in line with the PEFC ST 1003:2018.</p> <p>The draft ERGC of June 22, 2022, deviates herein from the last approved version of the ERGC (March 10, 2022). This assessment conclusion is thus dependable on the final approval of the draft ERGC.</p> <p>Concerning IMGs, the conformity with this benchmark is assessed in the <i>ATFS PEFC Checklist Group Forest Management</i>, section 9.2.2 b.</p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
c) select the auditors and conduct audits to ensure objectivity and the impartiality of the audit process;	Y	<p>ERGC, Internal monitoring: ... <i>For individual third-party certificate holders and the AFF's national certificate for ATFS state programs, specific requirements include: ...</i></p> <p><i>selection of auditors and execution of audits to ensure objectivity and the impartiality of the audit process</i></p> <p>Conclusion: Conformity</p> <p>Justification: The ERGC is in line with the PEFC ST 1003:2018.</p> <p>The draft ERGC of June 22, 2022, deviates herein from the last approved version of the ERGC (March 10, 2022). This assessment conclusion is thus dependable on the final approval of the draft ERGC.</p> <p>Concerning IMGs, the conformity with this benchmark is assessed in the <i>ATFS PEFC Checklist Group Forest Management</i>, section 9.2.2 d.</p>
d) ensure that the results of the audits are reported to relevant management;	Y	<p>ERGC, Internal monitoring: ... <i>For individual third-party certificate holders and the AFF's national certificate for ATFS state programs, specific requirements include: ...</i></p> <p><i>results of the audits are reported to relevant management</i></p> <p>Conclusion: Conformity</p> <p>Justification: The ERGC is in line with the PEFC ST 1003:2018.</p> <p>The draft ERGC of June 22, 2022, deviates herein from the last approved version of the ERGC (March 10, 2022). This assessment conclusion is thus dependable on the final approval of the draft ERGC.</p> <p>Concerning IMGs, the conformity with this benchmark is assessed in the <i>ATFS PEFC Checklist Group Forest Management</i>, section 9.2.2 e.</p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
e) retain documented information as evidence of the implementation of the audit programme and the audit results.	Y	<p>ERGC, Internal monitoring: ... <i>For individual third-party certificate holders and the AFF's national certificate for ATFS state programs, specific requirements include: ...</i></p> <p><i>retention of documented information as evidence of the implementation of the audit programme and the audit results.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The ERGC is in line with the PEFC ST 1003:2018.</p> <p>The draft ERGC of June 22, 2022, deviates herein from the last approved version of the ERGC (March 10, 2022). This assessment conclusion is thus dependable on the final approval of the draft ERGC.</p> <p>Concerning IMGs, the conformity with this benchmark is assessed in the <i>ATFS PEFC Checklist Group Forest Management</i>, section 9.2.2 f.</p>
9.3 Management review		
9.3.1 The standard requires that an annual management review shall at least include		
a) the status of actions from previous management reviews;	Y	<p>ERGC, Internal Management Review: <i>The certificate holder shall develop and implement an internal management review, which is a formal, annual review to determine the effectiveness of the certificate holder in achieving objectives and maintaining conformance with the AFF Standards of Sustainability. The management review includes review of changes to the operating environment as well as results and actions related to internal monitoring, internal audits, external certification audits, non-conformities and corrective actions, monitoring and measurement results, previous management reviews, and opportunities for continual improvement.</i></p> <p>Conclusion: Conformity</p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p>Justification: The ERGC is in line with the PEFC ST 1003:2018.</p> <p>The draft ERGC of June 22, 2022, deviates herein from the last approved version of the ERGC (March 10, 2022). This assessment conclusion is thus dependable on the final approval of the draft ERGC.</p> <p>Concerning IMGs, the conformity with this benchmark is assessed in the <i>ATFS PEFC Checklist Group Forest Management</i>, section 9.4.1 a.</p>
b) changes in external and internal issues that are relevant to the management system;	Y	<p>ERGC, Internal Management Review: ... <i>The management review includes review of changes to the operating environment</i> ...</p> <p>Conclusion: Conformity</p> <p>Justification: The ERGC is in line with the PEFC ST 1003:2018.</p> <p>The draft ERGC of June 22, 2022, deviates herein from the last approved version of the ERGC (March 10, 2022). This assessment conclusion is thus dependable on the final approval of the draft ERGC.</p> <p>Concerning IMGs, the conformity with this benchmark is assessed in the <i>ATFS PEFC Checklist Group Forest Management</i>, section 9.4.1 b.</p>
<p>c) information on the organisation's performance, including trends in:</p> <ul style="list-style-type: none"> • nonconformities and corrective actions; • monitoring and measurement results; • audit results; 	Y	<p>ERGC, Internal Management Review: ... <i>The management review includes ... internal audits, external certification audits, non-conformities and corrective actions, monitoring and measurement results</i> ...</p> <p>Conclusion: Conformity</p> <p>Justification: The ERGC is in line with the PEFC ST 1003:2018.</p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p>The draft ERGC of June 22, 2022, deviates herein from the last approved version of the ERGC (March 10, 2022). This assessment conclusion is thus dependable on the final approval of the draft ERGC.</p> <p>Concerning IMGs, the conformity with this benchmark is assessed in the <i>ATFS PEFC Checklist Group Forest Management</i>, section 9.4.1 d.</p>
d) opportunities for continual improvement	Y	<p>ERGC, Internal Management Review: ... <i>The management review includes ... opportunities for continual improvement.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The ERGC is in line with the PEFC ST 1003:2018.</p> <p>The draft ERGC of June 22, 2022, deviates herein from the last approved version of the ERGC (March 10, 2022). This assessment conclusion is thus dependable on the final approval of the draft ERGC.</p> <p>Concerning IMGs, the conformity with this benchmark is assessed in the <i>ATFS PEFC Checklist Group Forest Management</i>, section 9.4.1 e.</p>
9.3.2 The standard requires that the outputs of the management review shall include decisions related to continual improvement opportunities and any need for changes to the management system.	Y	<p>ERGC, Internal Management Review: ... <i>Internal management reviews shall produce a summary of decisions related to continual improvement opportunities and any need for changes to the management system. ...</i></p> <p>Conclusion: Conformity</p> <p>Justification: The ERGC is in line with the PEFC ST 1003:2018.</p> <p>The draft ERGC of June 22, 2022, deviates herein from the last approved version of the ERGC (March 10, 2022). This assessment conclusion is thus dependable on the final approval of the draft ERGC.</p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		Concerning IMGs, the conformity with this benchmark is assessed in the <i>ATFS PEFC Checklist Group Forest Management</i> , section 9.4.2.
9.3.3 The standard requires that documented information as evidence of the results of management reviews shall be retained.	Y	<p>ERGC, Internal Management Review: ... <i>Internal management reviews shall produce a summary of decisions related to continual improvement opportunities and any need for changes to the management system. The certificate holder shall retain this summary as evidence of the results of management reviews.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The ERGC requirement to retain a summary of decisions related to identified needs for changes in the management system and continual improvement opportunities resulting from the management review practically meets the benchmark requirement of documenting the results of the management review.</p> <p>The draft ERGC of June 22, 2022, deviates herein from the last approved version of the ERGC (March 10, 2022). This assessment conclusion is thus dependable on the final approval of the draft ERGC.</p> <p>Concerning IMGs, the conformity with this benchmark is assessed in the <i>ATFS PEFC Checklist Group Forest Management</i>, section 9.4.3.</p>
10. Improvement		
10.1 Nonconformity and corrective action		
10.1.1 The standard requires that when a nonconformity occurs, the organisation shall:		
a) react to the nonconformity and, as applicable: i. take action to control and correct it;	Y	Conclusion: Conformity



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
ii. deal with the consequences;		<p>Justification: Independent audits of the ATFS are conducted annually by ANAB-accredited Certification Bodies and documented in results reports. Corrective and preventative action plans are developed in response to any nonconformity issued during the audit. Implementation of these plans is reported to the Certification Bodies and effectiveness is assessed by the Certification Bodies. See <i>2020 Public Summary Report</i>.</p> <p>Concerning IMGs, the conformity with this benchmark is assessed in the <i>ATFS PEFC Checklist Group Forest Management</i>, section 10.1.1 a.</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>	N	<p>Conclusion: Minor non-conformity</p> <p>Justification: The ATFS incorporates a process of identifying and addressing nonconformities (see 10.1.1 a). However, the ATFS includes no requirements for individual certificate holders on evaluating the need for action to eliminate the causes of the nonconformity as stipulated by the PEFC ST 1003:2018.</p> <p>Concerning IMGs, the conformity with this benchmark is assessed in the <i>ATFS PEFC Checklist Group Forest Management</i>, section 10.1.1 b.</p>
c) implement any action needed;	N	<p>Conclusion: Minor non-conformity</p> <p>Justification: The ATFS includes no requirements for individual certificate holders to perform the evaluation stipulated by benchmark 10.1.1 b. Consequently, the ATFS includes no requirements for individual certificate holders to implement any action as a response to such evaluation.</p> <p>Concerning IMGs, the conformity with this benchmark is assessed in the <i>ATFS PEFC Checklist Group Forest Management</i>, section 10.1.1 c.</p>
d) review the effectiveness of any corrective action taken;	Y	Conclusion: Conformity



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p>Justification: Effectiveness of the corrective and preventative action addressing nonconformities issued during independent audits is assessed by the Certification Bodies (see 10.1.1 a).</p> <p>Concerning IMGs, the conformity with this benchmark is assessed in the <i>ATFS PEFC Checklist Group Forest Management</i>, section 10.1.1 d.</p>
e) make changes to the management system, if necessary.	N	<p>Conclusion: Minor non-conformity</p> <p>Justification: The ATFS does not include any requirements that links nonconformities to the function (and possible changes) in the management systems of individual certificate holders.</p> <p>Concerning IMGs, the conformity with this benchmark is assessed in the <i>ATFS PEFC Checklist Group Forest Management</i>, section 10.1.1 e.</p>
10.1.2 The standard requires that corrective actions shall be appropriate to the effects of the nonconformities encountered.	Y	<p>Conclusion: Conformity</p> <p>Justification: See 10.1.1 a.</p>
10.1.3 The standard requires that the organisation shall retain documented information as evidence of:		
a) the nature of the nonconformities and any subsequent actions taken;	Y	<p>Conclusion: Conformity</p> <p>Justification: Independent audits of the ATFS are conducted annually by ANAB-accredited Certification Bodies and documented in results reports. Corrective and preventative action plans are developed in response to any nonconformity issued during the audit. Implementation of these plans is reported to the Certification Bodies and effectiveness is assessed by the Certification Bodies. See <i>2020 Public Summary Report</i>.</p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		Concerning IMGs, the conformity with this benchmark is assessed in the <i>ATFS PEFC Checklist Group Forest Management</i> , section 10.1.2 a.
b) the results of any corrective action.	Y	Conclusion: Conformity Justification: See 10.1.3 a. Concerning IMGs, the conformity with this benchmark is assessed in the <i>ATFS PEFC Checklist Group Forest Management</i> , section 10.1.2 b.
10.2 Continual improvement The standard requires that the suitability, adequacy and effectiveness of the sustainable forest management system and the sustainable management of the forest shall be continuously improved.	Y	SS, Standards Prologue: ... <i>These Standards are designed as a tool to help woodland owners be effective stewards of the land as they adaptively manage renewable resources; ...</i> SS, Standard 1, PM 1.1, I 1.1.1: <i>Management plan shall be active, adaptive and embody the landowner's current objectives, remain appropriate for the land certified and reflect the current state of knowledge about natural resources and sustainable forest management.</i> Conclusion: Conformity Justification: The SS practically necessitates adaptive forest management based on internal monitoring and evaluation.

* If the answer to any question is no, the application documentation shall indicate for each element why and what alternative measures have been taken to address the element in question.

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

1. Scope

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

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

Referred AFTS Documents:

American Tree Farm System	2021 Independently Managed Group (IMG) Certification Standard V2.0 ¹⁰
---------------------------	--

2. Checklist

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	NA	Conclusion: Not applicable Justification: The American Tree Farm System (ATFS) Independently Managed Group (IMG) Certification Standards 2021 do not categorize group members by regional border.

¹⁰ As amended and Approved by the American Forest Foundation's National Standard Implementation Committee on March 10, 2022



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
<p>b) other groups and/or</p> <p>c) whether there are any other specific circumstances which influence the implementation of the group management system.</p>	<p>Y</p>	<p>The American Tree Farm System (ATFS) Independently Managed Group (IMG) Certification Standard V2.0 (hereafter the “IMG”)</p> <p><i>1.1. Purpose and Scope</i></p> <p><i>The ATFS IMG Certification Standards 2021 contain the requirements for the implementation by, and independent certification of, Independently Managed Groups (IMG) and associated Group Members. These standards apply specifically and exclusively to IMGs as a type of Group Organization, and do not apply to State Tree Farm programs, ATFS third-party certificate holders, or to Forest Management Units enrolled in the Small Lands Module developed in cooperation with the Sustainable Forestry Initiative (SFI).</i></p> <p><i>Group Organizations are comprised of multiple Group Members and represented by a Group Entity. Group Member properties are organized under one centrally administered Group Management System and included in a single Group Certificate. The Group Entity holds the Group Certificate on behalf of the Group Members and represents the Group Organization. This process is referred to throughout the document as “Group Certification.”</i></p> <p><i>Generally, the Group Entity has overall responsibility for ensuring conformance with the AFF Standards of Sustainability and the IMG Certification Standards. The Group Entity designates a Group Manager who is responsible for the day to day administration of the Group Management System and coordinates certain activities, such as:</i></p> <ul style="list-style-type: none"> <i>• Internal and external communication</i> <i>• Ensuring conformance to the AFF Standards of Sustainability and the IMG Certification Standards,</i> <i>• Administering entry and departure of Group Members,</i> <i>• Maintaining records and reporting,</i> <i>• Conducting ongoing Internal Monitoring, Internal Audits, and Internal Management Reviews</i> <i>• Implementation of a dispute resolution process</i> <i>• Managing the Group Certification process</i>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p>Conclusion: Conformity</p> <p>Justification:</p> <p>The IMG defines a general framework for the group organisation and defines the structure and functions of the different entities in the group organisation (Group Entity, Group Manager, Group Member).</p> <p>Note: The IMG is defined not to be applicable for State Tree Farm program(s) and not included in this assessment of group management certification through the IMG.</p>
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	Y	<p>IMG:</p> <p><i>5.2.3 Affected Stakeholders that are relevant for the Group Management System shall be identified along with the relevant expectations of these Affected Stakeholders. Affected Stakeholders include Group Members as well as external individuals and entities directly affected by Group Organization activities included in the scope of the Group Certification.</i></p> <p><i>Appendix A: Affected Stakeholder Identification and Communications.</i></p> <p><i>Approach</i></p> <p><i>1. In April of each year, following completion of the previous year's IMG reporting cycle, AFF will conduct an electronic stakeholder consultation outreach using email marketing automation software to all geographies where IMGs operate. A sample communication is copied at the end of this document. This shall be distributed to a list including but not limited to:</i></p> <ul style="list-style-type: none"> <i>Indigenous tribes and nations</i> <i>Currently enrolled IMG members</i> <i>Individual and communities, not included in the previous bullets, identified as affected stakeholders by IMGs during each annual reporting cycle</i>
b) the relevant expectations of these affected stakeholders.		



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p>2. Any responses received from potentially affected stakeholders will be forwarded to the relevant IMG. AFF will work with the IMG to determine if the individual/community meets the definition of an affected stakeholder.</p> <p>3. IMGs shall follow up with affected stakeholders within 90 days of receiving notification from AFF.</p> <p>4. IMGs shall report the date, time, and outcome of follow-up with affected stakeholders in that year's annual report to AFF.</p> <p>5. Stakeholder information is strictly confidential. Access will be restricted to only necessary members of ATFS staff and relevant IMG staff.</p> <p>Conclusion: Conformity</p> <p>Justification:</p> <p>The IMG include requirements on identification of the affected stakeholders as well as their expectations.</p> <p>In addition, AFF will conduct electronic stakeholder consultation. The IMG is required to follow up stakeholder responses from theses consultations and report to AFF.</p>
4.3 Determining the scope of the group management system		
4.3.1 The standard shall provide definitions relating to the following terms, which are in conformity with the definitions of those terms presented in chapter 3:		
a) the group organisation and the elements of the group organisation (group entity and participant),	Y	<p>IMG:</p> <p>3. Terms and Definitions</p> <p><u>Group Entity</u>: A legal entity competent to sign agreements with Group Members and to enter into binding contracts with Certification Bodies and other outside entities. The Group Entity represents the Group Members, with overall responsibility for ensuring the conformity of forest management in the Certified Area to the AFF Standards of Sustainability and other applicable requirements of the forest certification system, including the IMG Certification Standards. The structure of the group entity should align with the scale and complexity of the</p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p>group organization. <i>Note: Group Entity was previously referred to as “group organization” in the American Tree Farm System “2015-2020 IMG Standard Operating Procedures.”</i></p> <p><i>Group Manager: The individual(s) designated by an IMG Group Organization to manage the administrative elements of the Group Organization, including implementation of the Group Management System and conformance with the American Tree Farm System® IMG Certification Standards.</i></p> <p><i>Group Member: A forest owner or manager covered by the Group Certificate, who has the ability to implement the requirements of the AFF Standards of Sustainability in a Certified Area. Group Members shall have a long-term legal right, tenure right or traditional or customary tenure rights to manage the forest. Short-term Forestry Contractors are not eligible to participate as Group Members. Note: Group Member is equivalent to “participant” as defined in the PEFC Group Forest Management standard (PEFC ST 1002:2018).</i></p> <p><i>Group Organization: A collection of Group Members represented by the Group Entity for the purposes of implementation of the AFF Standards for Sustainability and its certification under the ATFS IMG Certification Standards. A binding written agreement shall be established between a Group Member and the Group Entity. Note: The term “Group Organization” is synonymous with “IMG” in the context of the ATFS IMG Certification Standards.</i></p> <p><i>Independently Managed Group (IMG): Synonymous with Group Organization. The IMG supports Group Members in the stewardship of Forest Management Units under a single, centrally administered Group Certification.</i></p> <p>Conclusion: Conformity</p> <p>Justification:</p> <p>IMG is defining the group organization and its various elements in accordance with the PEFC ST 1002:2018</p>
b) the certified area,	Y	<p>IMG:</p> <p>3. <i>Terms and Definitions</i></p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p><i>Certified Area: The forest area covered by an ATFS certificate. In the context of IMG certification, the certified area is the sum of forest areas of the Group Members and covered by a Group Certificate.</i></p> <p>Conclusion: Conformity</p> <p>Justification:</p> <p>The certified area is defined in the IMG in accordance with the PEFC ST 1002:2018</p>
c) the group certificate and	Y	<p>IMG:</p> <p><i>3 Terms and Definitions</i></p> <p><i>Group Certificate: A formal document issued to a Group Entity confirming that the Group Organization complies with the requirements of the ATFS IMG Certification Standards and other applicable requirements of the ATFS forest certification system.</i></p> <p>Conclusion: Conformity</p> <p>Justification:</p> <p>The group certificate is defined in the IMG in accordance with the PEFC ST 1002:2018</p>
d) the document confirming participation in group certification.	Y	<p>IMG:</p> <p><i>3. Terms and Definitions</i></p> <p><i>Document Confirming Participation in the Group: A document issued to a Group Member that refers to the IMG Group Certificate and confirms the Group Member is being covered by the scope of the group forest certification.</i></p> <p>Conclusion: Conformity</p> <p>Justification:</p> <p>The definition in the IMG is in accordance with the PEFC ST 1002:2018</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.	Y	<p>IMG:</p> <p><i>4.3.2.5 The Group Entity shall implement and maintain a documented Group Management System to include a description of boundaries, applicability, and roles and responsibilities of</i></p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p><i>all participants in the Group Organization. A description of the scope of the group management system shall be publicly available upon request.</i></p> <p>Conclusion: Conformity</p> <p>Justification:</p> <p>The IMG requires the establishment of a group management system that is to include description of boundaries, applicability, and roles and responsibilities of all participants in the Group Organization.</p>
4.3.3 The standard shall define which requirements of the sustainable forest management standard may be fulfilled on group level.	Y	<p>IMG:</p> <p>4.4 Group Level Conformance</p> <p>4.4.1 All AFF Standards of Sustainability apply to every Forest Management Unit included in an Group Certificate, <i>however conformance to some requirements may be demonstrated at the group level. Specifically, at the discretion of the Group Organization, and as noted in the Guidance for Performance Measure 1.1 of the AFF Standards of Sustainability, Umbrella Management Plans may be used in the management of multiple forest management units.</i></p> <p>4.4.2 <i>If a Group Organization elects to fulfill any requirements of the AFF Standards of Sustainability at the group level as opposed to the individual Forest Management Unit level, these requirements shall be recorded in the Group Management Plan.</i></p> <p>4.4.3 <i>The Group Entity shall ensure that each Forest Management Unit included in the Certified Area either has an individual forest management plan or is covered by an Umbrella Management Plan.</i></p> <p>Conclusion: Conformity</p> <p>Justification:</p> <p>The definition in the IMG is in accordance with the PEFC ST 1002:2018</p>
4.3.4 The standard requires that the scope shall be made available as documented information.	Y	<p>IMG:</p> <p>4.3.2.5 <i>The Group Entity shall implement and maintain a documented Group Management System to include a description of boundaries, applicability, and roles and responsibilities of</i></p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p><i>all participants in the Group Organization. A description of the scope of the group management system shall be publicly available upon request.</i></p> <p><i>4.3.2.11 The Group Entity shall issue a document to each Group Member that confirms the Group Member participation and coverage by the scope of the third-party certificate.</i></p> <p>Conclusion: Conformity</p> <p>Justification:</p> <p>The definition in the IMG is in accordance with the PEFC ST 1002:2018</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.	Y	<p>IMG:</p> <p><i>3. Terms and Definitions</i></p> <p><i>Group Member: ...Note: Group Member is equivalent to “participant” as defined in the PEFC Group Forest Management standard (PEFC ST 1002:2018).</i></p> <p><i>6.1 All Group Members shall be subject to ongoing Internal Monitoring and the Internal Audit program.</i></p> <p>Conclusion: Conformity</p> <p>Justification:</p> <p>The requirements in the IMG is in line with PEFC ST 1002:2018</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.	NA	<p>IMG:</p> <p>Conclusion: Not applicable</p> <p>Justification:</p> <p>The ATFS does not make a reference to any scheme specific or PEFC provisions for chain of custody certification. Producers of the ATFS certified timber may apply for chain of custody certification under the SFI scheme that also is responsible for issuance of PEFC logo licenses. The provisions for chain of custody certification or issuance of PEFC labels</p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		are not covered by this assessment. However, ANAB Rule 27 requires that certification bodies assess the PEFC logo usage compliance.
5. Leadership		
5.1 Organisational roles, responsibilities and authorities		
5.1.1 Functions and responsibilities of the group entity		
The standard requires that the following functions and responsibilities of the group entity shall be specified:		
a) to implement and maintain an effective management system covering all participants of the group;	Y	<p>IMG:</p> <p><i>3. Terms and Definitions</i></p> <p><i>Group Organization: A collection of Group Members represented by the Group Entity for the purposes of implementation of the AFF Standards for Sustainability and its certification under the ATFS IMG Certification Standards...</i></p> <p><i>4.3.2.5 The Group Entity shall implement and maintain a documented Group Management System to include a description of boundaries, applicability, and roles and responsibilities of all participants in the Group Organization.</i></p> <p>Conclusion: Conformity</p> <p>Justification:</p> <p>The requirements in the IMG is in line with PEFC ST 1002:2018</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;	Y	<p>IMG:</p> <p><i>4.3.2.8 The Group Entity shall hold the ATFS Group Certificate on behalf of the Group Members and represents the Group Organization in the certification process.</i></p> <p><i>4.3.2.13 The Group Entity shall coordinate the independent audit procedure to ensure the Certification Body has access to sufficient information and Group Member properties to determine conformance to the AFF Standards of Sustainability and ATFS IMG Certification Standard.</i></p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p>6.6.1 The Group Entity shall contract with an accredited Certification Body to conduct the independent certification.</p> <p>Conclusion: Conformity</p> <p>Justification:</p> <p>The requirements in the IMG is in line with PEFC ST 1002:2018</p>
c) to establish written procedures for the management of the group organisation;	Y	<p>1 IMG:</p> <p>4.3.2.5 The Group Entity shall implement and maintain a documented Group Management System to include a description of boundaries, applicability, and roles and responsibilities of all participants in the Group Organization. A description of the scope of the group management system shall be publicly available upon request.</p> <p>Conclusion: Conformity</p> <p>Justification:</p> <p>The requirements in the IMG on a “documented Group Management System” fulfils the requirements in the PEFC ST 1002:2018</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)	Y	<p>2 IMG:</p> <p>4.1.2 The Group Organization shall adhere to ATFS Eligibility Requirements and may further define membership parameters, if desired.</p> <p>4.2.1 The Group Entity shall define and administer a procedure for admitting Group Members. Conformance with ATFS Eligibility Requirements and AFF Standards of Sustainability shall be determined prior to FMU enrollment in the group certificate.</p> <p>Conclusion: Conformity</p> <p>Justification:</p> <p>The IMG include requirements on administrative procedures for admitting Group Members. The ATFS Eligibility Requirements include requirements on landowner forest property and size.</p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
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	Y	<p>IMG:</p> <p><i>4.2.2 The Group Entity shall define and administer a procedure for expelling Group Members if they do not meet the requirements of the AFF Standards of Sustainability and ATFS IMG Standards and are not willing or able to take appropriate corrective action.</i></p> <p><i>4.2.3 Group Members that have been expelled shall be internally audited by the Group Entity prior to re-admittance in the Group Certificate. The internal audit shall not take place sooner than 12 months after the Group Member was removed from the Group Certificate.</i></p> <p>Conclusion: Conformity</p> <p>Justification:</p> <p>The requirements in the IMG are equivalent to the PEFC ST 1002:2018.</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>	Y	<p>IMG:</p> <p><i>5.4.2 The Group Entity shall maintain current internal Group Member records and provide updated information on a regular basis to the ATFS database to reflect entries and departures of Group Members from the Group Organization. Group Member records shall minimally include contact details, size and location of enrolled Forest Management Units and corresponding Certified Area, and conformance with applicable ATFS certification requirements.</i></p> <p><i>6.2.1 An ongoing internal monitoring program shall be established and implemented by the Group Entity to assess the effectiveness of the Group Organization in implementing the Group Management System to maintain conformance with the AFF Standards of Sustainability. The internal monitoring program shall at minimum define the following:</i></p> <p>.....</p> <p><i>e. documented monitoring information available as evidence for internal and external audits</i></p> <p>Conclusion: Conformity</p> <p>Justification:</p> <p>The requirements in the IMG are in line with PEFC ST 1002:2018.</p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
<p>g) to establish connections with all participants based on a binding written agreement which shall include the participants' commitment to comply with the sustainable forest management standard. The group entity shall have a written contract or other written agreement with all participants covering the right of the group entity to implement and enforce any corrective or preventive measures, and to initiate the exclusion of any participant from the scope of certification in the event of nonconformity with the sustainable forest management standard;</p> <p>Note: The requirements for "participant' commitment" and "written contract or other written agreement with all participants" may also be satisfied by the commitment of and written agreement of a pre-existing organisation or group or the members participation, such as a forest owners'/managers' association, SFM programme and submission to tax programming, where the organisation can demonstrate that it has a legal mandate to represent the participants and where its commitment and the terms and conditions of the contract are enforceable.</p>	Y	<p>IMG:</p> <p><i>4.3.2.4 The Group Entity shall have a binding written agreement with each Group Member to minimally include the following elements:</i></p> <ul style="list-style-type: none"> <i>a. A commitment by the Group Member to maintain conformance with the AFF Standards of Sustainability</i> <i>b. The right of the Group Entity to ensure applicable corrective actions and preventive measures are implemented</i> <i>c. The right of the Group Entity to initiate removal of Group Members from the Group</i> <p>Conclusion: Conformity</p> <p>Justification:</p> <p>The requirements in the IMG are in line with PEFC ST 1002:2018.</p>
<p>h) to provide all participants with a document confirming participation in the group forest certification;</p>	Y	<p>IMG:</p> <p><i>4.3.2.11 The Group Entity shall issue a document to each Group Member that confirms the Group Member participation and coverage by the scope of the third-party certificate.</i></p> <p>Conclusion: Conformity</p> <p>Justification:</p> <p>The requirements in the IMG are in line with PEFC ST 1002:2018.</p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
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;	Y	<p>IMG:</p> <p><i>4.3.2.2 The Group Entity shall designate a Group Manager(s) who is responsible for overseeing the administrative details of Group Certification and for ensuring compliance with all applicable requirements.</i></p> <p><i>4.3.2.9 The Group Entity shall ensure that Group Members are notified that they are subject to all of the requirements and privileges of membership in the American Tree Farm System®.</i></p> <p><i>4.3.2.10 The Group Entity shall make the AFF Standards of Sustainability accessible to Group Members.</i></p> <p><i>5.2.2 Communication processes shall be defined and regularly implemented to ensure Group Members remain informed of key aspects for participation in the IMG Group Certificate to include, at a minimum, the following:</i></p> <p style="padding-left: 40px;"><i>b. Requirements of the AFF Standards of Sustainability</i></p> <p style="padding-left: 40px;"><i>c. Roles and responsibilities for maintaining effectiveness of the Group Management System, including sustainable forest management and continual improvement of Group Organization performance</i></p> <p><i>6.7.2 In the case that corrective actions are required to address identified non-conformities, the Group Entity shall work with the Group Members and other appropriate parties to ensure timely implementation of the corrective action and monitor its effectiveness in maintaining conformity.</i></p> <p>Conclusion: Conformity</p> <p>Justification:</p> <p>The requirements in the IMG fulfils the requirements in PEFC ST 1002:2018.</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;	Y	<p>IMG:</p> <p><i>6.7.2 In the case that corrective actions are required to address identified non-conformities, the Group Entity shall work with the Group Members and other appropriate parties to ensure</i></p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p><i>timely implementation of the corrective action and monitor its effectiveness in maintaining conformity.</i></p> <p><i>6.7.3 The Group Entity shall address any non-conformities reported by Group Members that were identified under other PEFC-endorsed certificates prior to enrolling in the IMG Group Certificate.</i></p> <p>Conclusion: Conformity</p> <p>Justification:</p> <p>The requirements in the IMG are in line with PEFC ST 1002:2018.</p>
k) to operate an internal monitoring programme that provides for the evaluation of the participants' conformity with the certification requirements;	Y	<p>IMG:</p> <p><i>6.2.1 An ongoing internal monitoring program shall be established and implemented by the Group Entity to assess the effectiveness of the Group Organization in implementing the Group Management System to maintain conformance with the AFF Standards of Sustainability.</i></p> <p><i>4.3.2.6 The Group Entity shall develop and implement internal performance evaluation activities that collectively provide for the assessment of Group Organization (Group Members and Group Entity) conformity with the Group Management System and ATFS certification requirements. These internal assessment activities shall include the following elements:</i></p> <p><i>a. Ongoing internal monitoring of conformance of the Group Organization's forest operations with the AFF Standards of Sustainability (Refer to Section 6.2)</i></p> <p>Conclusion: Conformity</p> <p>Justification:</p> <p>The requirements in the IMG are in line with PEFC ST 1002:2018.</p>
l) to operate an annual internal audit programme covering both group members and group entity;	Y	<p>IMG:</p> <p><i>4.3.2.6 The Group Entity shall develop and implement internal performance evaluation activities that collectively provide for the assessment of Group Organization (Group Members and Group Entity) conformity with the Group Management System and ATFS certification requirements. These internal assessment activities shall include the following elements:</i></p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p>.....</p> <p><i>b. Annual Internal Audit of the Group Organization's conformance with the Group Management System, inclusive of the AFF Standards of Sustainability (Refer to Section 6.3)</i></p> <p>Conclusion: Conformity</p> <p>Justification:</p> <p>The requirements in the IMG are in line with PEFC ST 1002:2018.</p>
m) to operate a management review of the group forest certification and acting on the results from the review;	Y	<p>IMG:</p> <p><i>4.3.2.6 The Group Entity shall develop and implement internal performance evaluation activities that collectively provide for the assessment of Group Organization (Group Members and Group Entity) conformity with the Group Management System and ATFS certification requirements. These internal assessment activities shall include the following elements:</i></p> <p><i>c. Annual Internal Management Review of the Group Certification, inclusive of internal and external monitoring and audit results, and actions taken as appropriate in response to the results of the management review (Refer to Section 6.4)</i></p> <p><i>6.7.5 The Group Entity shall keep the Group Organization's Group Management System up-to-date, and make changes as needed to maintain ongoing conformance with the AFF Standards of Sustainability and the ATFS IMG Certification Standards.</i></p> <p>Conclusion: Conformity</p> <p>Justification:</p> <p>The requirements in the IMG are in line with PEFC ST 1002:2018.</p>
n) to provide full co-operation and assistance in responding effectively to all requests from the certification body, accreditation body, PEFC International or the National Governing Body for relevant data, documentation or other information; allowing access to the forest area covered by the group organisation and other facilities, whether in connection	Y	<p>IMG:</p> <p><i>4.3.2.15 The Group Entity shall agree to provide full co-operation and assistance in responding effectively to all requests from the Certification Body, Accreditation Body, PEFC International or the American Forest Foundation for relevant data, documentation or other information; allowing access to the Forest Management Units enrolled in the IMG Group</i></p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
with formal audits or reviews or otherwise related or with implications for the management system.		<p><i>Certification, whether in connection with formal audits or reviews or otherwise related to the Group Management System</i></p> <p>Conclusion: Conformity</p> <p>Justification:</p> <p>The requirements in the IMG are in line with PEFC ST 1002:2018.</p>
<p>5.1.2 Function and responsibilities of participants</p> <p>The standard requires that the following functions and responsibilities of the participants shall be specified:</p>		
<p>a) To provide the group entity with a binding written agreement, including a commitment on conformity with the sustainable forest management standard and other applicable requirements of the forest certification system; group participants excluded from any certification group cannot apply for group membership within 12 months after exclusion.</p> <p>Note: The requirement for “written agreement” and participants’ “commitment” is also satisfied by the commitment of and written agreement of a pre-existing organisation or group or the members participation, such as a forest owners’/managers’ association, SFM programme and submission to tax programming, where the organisation can demonstrate that it has a legal mandate to represent the participants and where its commitment and the terms and conditions of the contract are enforceable.</p>	N	<p>IMG:</p> <p><i>4.3.3.1 Group Members shall provide a written commitment to practice sustainable forestry, adhere to the requirements of the Group Management System and to meet all applicable requirements of the AFF Standards of Sustainability and related ATFS certification requirements on their Forest Management Units enrolled in Certified Area of the Group Certification.</i></p> <p><i>4.2.3 Group Members that have been expelled shall be internally audited by the Group Entity prior to re-admittance in the Group Certificate. The internal audit shall not take place sooner than 12 months after the Group Member was removed from the Group Certificate.</i></p> <p>Conclusion: Minor Non-Conformity</p> <p>Justification:</p> <p>PEFC ST 1002:2018 defines that group participants excluded from <u>any certification group</u> cannot apply for group membership within 12 months after exclusion, while IMG talks about <u>re-admittance</u>, which implies restricting the exclusion only to the IMG from which the group member was excluded. Hence the requirements in the IMG is more narrow than the PEFC ST 1002:2018.</p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
b) To provide the group entity with information about previous group participation.	Y	<p>IMG:</p> <p><i>4.3.2.14 The Group Entity shall verify if Forest Management Unit proposed for the Group Certificate are currently, or were previously, included in another Group Certificate. The Group Entity shall request Group Members to provide relevant information regarding participation in other group certificates, including the name and location of the group, as well as any identified nonconformities.</i></p> <p>Conclusion: Conformity</p> <p>Justification:</p> <p>The requirements in the IMG are in line with PEFC ST 1002:2018.</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;	Y	<p>IMG:</p> <p><i>4.3.3.1 Group Members shall provide a written commitment to practice sustainable forestry, adhere to the requirements of the Group Management System and to meet all applicable requirements of the AFF Standards of Sustainability and related ATFS certification requirements on their Forest Management Units enrolled in Certified Area of the Group Certification.</i></p> <p><i>4.3.3.2 Group Members shall agree to implement corrective and preventative actions established by the Group Entity.</i></p> <p>Conclusion: Conformity</p> <p>Justification:</p> <p>The requirements in the IMG are in line with PEFC ST 1002:2018.</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	Y	<p>IMG:</p> <p><i>4.3.3.3 Group members shall 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, and shall allow access to Forest Management Units</i></p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
connection with formal audits or reviews or otherwise related or with implications for the management system;		<p>included in the Group Certification, whether in connection with formal audits or reviews or otherwise related to the Group Management System.</p> <p>Conclusion: Conformity</p> <p>Justification:</p> <p>The requirements in the IMG are in line with PEFC ST 1002:2018.</p>
e) to inform the group entity about nonconformities identified under other PEFC certifications than the particular group certification.	Y	<p>IMG:</p> <p><i>4.3.2.14 The Group Entity shall verify if Forest Management Unit proposed for the Group Certificate are currently, or were previously, included in another Group Certificate. The Group Entity shall request Group Members to provide relevant information regarding participation in other group certificates, including the name and location of the group, as well as any identified nonconformities.</i></p> <p>Conclusion: Conformity</p> <p>Justification:</p> <p>The requirements in the IMG are in line with PEFC ST 1002:2018.</p>
f) to implement relevant corrective and preventive actions established by the group entity.	Y	<p>IMG:</p> <p><i>4.3.3.2 Group Members shall agree to implement corrective and preventative actions established by the Group Entity.</i></p> <p>Conclusion: Conformity</p> <p>Justification:</p> <p>The requirements in the IMG are in line with PEFC ST 1002:2018.</p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
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;	Y	<p>IMG:</p> <p><i>1.1 Purpose and Scope</i></p> <p><i>Generally, the Group Entity has overall responsibility for ensuring conformance with the AFF Standards of Sustainability and the IMG Certification Standards.</i></p> <p><i>Group entity:... The Group Entity represents the Group Members, with overall responsibility for ensuring the conformity of forest management in the Certified Area to the AFF Standards of Sustainability and other applicable requirements of the forest certification system, including the IMG Certification Standards.</i></p> <p><i>4.3.2.3 The Group Entity shall provide a written commitment that minimally includes the following elements. This commitment may be included in a Group Management Policy and shall be made publicly available upon request.</i></p> <p><i>a. to operate an integrated Group Management System for maintaining conformance to the AFF Standards of Sustainability, the ATFS IMG Standards and other requirements of ATFS certification.</i></p> <p>Conclusion: Conformity</p> <p>Justification:</p> <p>The requirements in the IMG are in line with PEFC ST 1002:2018.</p>
b) to integrate the group certification requirements in the group management system;	Y	<p>IMG:</p> <p><i>3. Terms and Definitions</i></p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p><i>Group Management System: Set of interrelated or interacting elements of a Group Organization to achieve the objectives and outcomes of the AFF Standards of Sustainability and the ATFS IMG Certification Standard requirements.</i></p> <p><i>4.3.2.3 The Group Entity shall provide a written commitment that minimally includes the following elements. This commitment may be included in a Group Management Policy and shall be made publicly available upon request.</i></p> <p><i>a. to operate an integrated Group Management System for maintaining conformance to the AFF Standards of Sustainability, the ATFS IMG Standards and other requirements of ATFS certification.</i></p> <p>Conclusion: Conformity Justification: The requirements in the IMG are in line with PEFC ST 1002:2018.</p>
c) to continuously improve the group management system;	Y	<p>IMG:</p> <p><i>4.3.2.3 The Group Entity shall provide a written commitment that minimally includes the following elements. This commitment may be included in a Group Management Policy and shall be made publicly available upon request.</i></p> <p><i>b. to continuously improve the Group Management System and support the improvement of sustainable forest management on Forest Management Units enrolled in the Group Organization's Group Certification.</i></p> <p>Conclusion: Conformity Justification: The requirements in the IMG are in line with PEFC ST 1002:2018.</p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
d) to continuously support the improvement of the sustainable management of the land/forests by the participants.	Y	<p>IMG:</p> <p><i>4.3.2.3 The Group Entity shall provide a written commitment that minimally includes the following elements. This commitment may be included in a Group Management Policy and shall be made publicly available upon request.</i></p> <p><i>b. to continuously improve the Group Management System and support the improvement of sustainable forest management on Forest Management Units enrolled in the Group Organization's Group Certification.</i></p> <p>Conclusion: Conformity Justification: The requirements in the IMG are in line with PEFC ST 1002:2018.</p>
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.	Y	<p>IMG:</p> <p><i>4.3.2.3 The Group Entity shall provide a written commitment that minimally includes the following elements. This commitment may be included in a Group Management Policy and shall be made publicly available upon request.</i></p> <p>Conclusion: Conformity Justification: The requirements in the IMG are in line with PEFC ST 1002:2018.</p>
5.2.3 The standard requires that the participants shall provide a commitment		
a) to follow the rules of the management system;	Y	<p>IMG:</p> <p><i>4.3.3.1 Group Members shall provide a written commitment to practice sustainable forestry, adhere to the requirements of the Group Management System and to meet all applicable requirements of the AFF Standards of Sustainability and related ATFS certification</i></p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p><i>requirements on their Forest Management Units enrolled in Certified Area of the Group Certification.</i></p> <p>Conclusion: Conformity Justification: The requirements in the IMG are in line with PEFC ST 1002:2018.</p>
b) to implement the requirements of the sustainability standard in their operations in their area.	Y	<p>IMG:</p> <p><i>4.3.3.1 Group Members shall provide a written commitment to practice sustainable forestry, adhere to the requirements of the Group Management System and to meet all applicable requirements of the AFF Standards of Sustainability and related ATFS certification requirements on their Forest Management Units enrolled in Certified Area of the Group Certification.</i></p> <p>Conclusion: Conformity Justification: The requirements in the IMG are in line with PEFC ST 1002:2018.</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.	Y	<p>IMG:</p> <p><i>5.1.4 The Group Entity shall have a procedures for periodically assessing, planning and implementing any changes in Group Organization structure or the Group Management System needed for ongoing conformance and continual improvement. Any such planned changes shall be recorded in the Group Management Plan prior to implementation.</i></p> <p>Conclusion: Conformity Justification: The requirements in the IMG are in line with PEFC ST 1002:2018.</p>






Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
6.2 The standard requires that if a group organisation decides to fulfil requirements of the sustainable forest management standard on the group level, these requirements shall be considered in a group management plan.	Y	<p>IMG:</p> <p><i>4.4.1 If a Group Organization elects to fulfil any requirements of the AFF Standards of Sustainability at the group level as opposed to the individual Forest Management Unit level, these requirements shall be recorded in the Group Management Plan.</i></p> <p>Conclusion: Conformity</p> <p>Justification:</p> <p>The requirements in the IMG are in line with PEFC ST 1002:2018.</p>
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.	Y	<p>IMG:</p> <p><i>5.1.1 Resources needed for the establishment, implementation, maintenance, ongoing conformance, and continual improvement of the Group Management System shall be determined and provided.</i></p> <p>Conclusion: Conformity</p> <p>Justification:</p> <p>The requirements in the IMG are in line with PEFC ST 1002:2018.</p>
7.2 The standard shall define the necessary competence of persons doing work in the group management system.	Y	<p>IMG:</p> <p><i>4.3.1.1 All persons contributing to the IMG Group Management System shall possess sufficient qualifications and knowledge necessary to fully perform assigned roles. Minimum competency requirements shall be established and verified by the Group Entity prior to engaging the services of contributing individuals and entities, including Internal Auditors and Forestry Contractors.</i></p> <p><i>4.3.1.2 Inspectors of the Group Organization conducting Internal Monitoring shall have completed the current ATFS Tree Farm Inspector training course.</i></p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		Conclusion: Conformity Justification: The requirements in the IMG are in line with PEFC ST 1002:2018.
7.3 The standard requires that communication processes shall be in place to raise the awareness of participants concerning:		
a) the group management policy;	Y	 IMG: <i>5.2.2 Communication processes shall be defined and regularly implemented to ensure Group Members remain informed of key aspects for participation in the IMG Group Certificate to include, at a minimum, the following:</i> <i>a. Group Management Policy</i> Conclusion: Conformity Justification: The requirements in the IMG are in line with PEFC ST 1002:2018.
b) the requirements of the sustainable forest management standard;	Y	 IMG: <i>5.2.2 b. Requirements of the AFF Standards of Sustainability</i> Conclusion: Conformity Justification: The requirements in the IMG are in line with PEFC ST 1002:2018.
c) their contribution to the effectiveness of the group management system and the sustainable forest	Y	 IMG:



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
management, including the benefits of improved group performance;		<p><i>5.2.2 c. Roles and responsibilities for maintaining effectiveness of the Group Management System, including sustainable forest management and continual improvement of Group Organization performance</i></p> <p>Conclusion: Conformity</p> <p>Justification: The requirements in the IMG are in line with PEFC ST 1002:2018.</p>
d) the implications of not conforming with the group management system requirements.	Y	<p>IMG:</p> <p><i>5.2.2 e. Implications of non-conformance with the requirements of the Group Management System</i></p> <p>Conclusion: Conformity</p> <p>Justification: The requirements in the IMG are in line with PEFC ST 1002:2018.</p>
7.4 The standard requires that the internal and external communications relevant to the group management system shall be determined. This includes:		
a) on what to communicate; b) when to communicate; c) with whom to communicate; d) how to communicate.	Y	<p><i>5.2.1 Internal and external communication activities relevant to the Group Management System shall be implemented according to established protocols addressing purpose, subject matter, methods, frequency, and recipients.</i></p> <p>Conclusion: Conformity</p> <p>Justification: The requirements in the IMG are in line with PEFC ST 1002:2018.</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.	Y	<p>IMG:</p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p>5.3.1 The Group Organization shall have a procedure for addressing and resolving disputes regarding conformance with the AFF Standards of Sustainability between and among the Group Members and the Group Organization pertaining to ATFS certification.</p> <p>5.3.2 The Group Organization shall follow and conform to the AFF Disputes and Appeals Procedures and assist ATFS in resolving any such complaints.</p> <p>Conclusion: Conformity</p> <p>Justification:</p> <p>The requirements in the IMG are in line with PEFC ST 1002:2018.</p>
7.6 The standard requires that the documented information relevant to the group management system and the conformance with the requirements of the sustainable forest management standard is:		
a) up to date;	Y	<p>IMG:</p> <p>5.4.2 The Group Entity shall maintain current internal Group Member records and provide updated information on a regular basis to the ATFS database to reflect entries and departures of Group Members from the Group Organization. Group Member records shall minimally include contact details, size and location of enrolled Forest Management Units and corresponding Certified Area, and conformance with applicable ATFS certification requirements.</p> <p>Conclusion: Conformity</p> <p>Justification:</p> <p>The requirements in the IMG are in line with PEFC ST 1002:2018.</p>
b) available and suitable for use, where and when it is needed;	Y	<p>IMG:</p> <p>5.4.1 Documented information relevant to the Group Management System and the conformance with the requirements of the AFF Standards of Sustainability is adequately protected against loss of confidentiality, improper use, or loss of integrity.</p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p><i>4.3.2.15 The Group Entity shall agree to provide full co-operation and assistance in responding effectively to all requests from the Certification Body, Accreditation Body, PEFC International or the American Forest Foundation for relevant data, documentation or other information; allowing access to the Forest Management Units enrolled in the IMG Group Certification, whether in connection with formal audits or reviews or otherwise related to the Group Management System.</i></p> <p>Conclusion: Conformity Justification: The requirements in the IMG are in line with PEFC ST 1002:2018.</p>
c) adequately protected against loss of confidentiality, improper use, or loss of integrity.	Y	<p>IMG:</p> <p><i>5.4.1 Documented information relevant to the Group Management System and the conformance with the requirements of the AFF Standards of Sustainability is adequately protected against loss of confidentiality, improper use, or loss of integrity.</i></p> <p>Conclusion: Conformity Justification: The requirements in the IMG are in line with PEFC ST 1002:2018.</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	Y	<p>IMG:</p> <p><i>5.1.2 Group Organizations shall plan, implement, and control processes needed to maintain conformance with the requirements of the AFF Standards of Sustainability and the IMG Certification Standards. These processes shall be included in the Group Management System and described in the Group Management Plan.</i></p>



PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		Conclusion: Conformity Justification: The requirements in the IMG are in line with PEFC ST 1002:2018.
b) to implement the actions determined in 6.	Y	IMG: <i>5.1.4 The Group Entity shall have a procedures for periodically assessing, planning and implementing any changes in Group Organization structure or the Group Management System needed for ongoing conformance and continual improvement. Any such planned changes shall be recorded in the Group Management Plan prior to implementation.</i> Conclusion: Conformity Justification: The requirements in the IMG are in line with PEFC ST 1002:2018.
8.2 The standard requires that this planning, implementing and controlling shall be done by:		
a) defining the necessary processes and establishing criteria for those; b) implementing control of the processes in accordance with the criteria; c) keeping documented information to the extent necessary to have confidence that the processes have been carried out as planned.	Y	IMG: <i>5.1.3 Criteria shall be established for processes defined in the Group Management System, and these processes shall be implemented in accordance with established criteria. Documented information shall be retained to the extent necessary to demonstrate processes have been properly implemented.</i> Conclusion: Conformity Justification: The requirements in the IMG are in line with PEFC ST 1002:2018.







Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
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; b) the methods for monitoring, measurement, analysis and evaluation, as applicable, to ensure valid results; c) when the monitoring and measuring shall be performed; d) when the results from monitoring and measurement shall be analysed and evaluated; e) what documented information shall be available as evidence of the results.	Y	<p><i>6.2.1 An ongoing internal monitoring program shall be established and implemented by the Group Entity to assess the effectiveness of the Group Organization in implementing the Group Management System to maintain conformance with the AFF Standards of Sustainability. The internal monitoring program shall at minimum define the following:</i></p> <ul style="list-style-type: none"> <i>a. values, processes, and corresponding criteria to be monitored</i> <i>b. methodology used to ensure valid monitoring results</i> <i>c. when monitoring and measuring are conducted</i> <i>d. when monitoring results are analyzed and evaluated</i> <i>e. documented monitoring information available as evidence for internal and external audits</i> <p>Conclusion: Conformity Justification: The requirements in the IMG are in line with PEFC ST 1002:2018.</p>
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.	Y	<p>IMG:</p> <p><i>6.2.1 An ongoing internal monitoring program shall be established and implemented by the Group Entity to assess the effectiveness of the Group Organization in implementing the Group Management System to maintain conformance with the AFF Standards of Sustainability.</i></p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		Conclusion: Conformity Justification: The requirements in the IMG are in line with PEFC ST 1002:2018.
9.2 Internal audit		
9.2.1 Objectives		
9.2.1.1 The standard requires that an annual internal audit programme shall provide information on whether the group management system:		
a) conforms to i. the group organisation's own requirements for its group management system; ii. the requirements of the national group certification standard;	Y	  Conclusion: Conformity Justification: The requirements in the IMG are in line with PEFC ST 1002:2018.
b) ensures the implementation of the sustainable forest management standard on the participant level;	Y	  Conclusion: Conformity Justification:



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		The requirements in the IMG are in line with PEFC ST 1002:2018.
c) is effectively implemented and maintained.	Y	<p>IMG:</p> <p><i>6.3.1.1 An Internal Audit shall be conducted annually to determine if the Group Management System Is effectively implemented and maintained. Internal audits shall include an evaluation of whether the Group Management System meets the requirements of the AFF Standards of Sustainability, ATFS IMG Certification Standard as well as the criteria established by the Group Organization for processes defined in the Group Management System.</i></p> <p>Conclusion: Conformity</p> <p>Justification:</p> <p>The requirements in the IMG are in line with PEFC ST 1002:2018.</p>
9.2.1.2 The standard requires that the internal audit programme shall cover the group entity and all group participants. The group entity shall be audited annually. The participants may be selected on a sample basis.	Y	<p>IMG:</p> <p><i>6.4.1 All Group Members and the Group Entity shall be subject to Internal Audits sufficient to ensure conformance with the AFF Standards of Sustainability at the Group Member level. Group Members may be audited on a sample basis; however, the Group Entity shall be audited each year.</i></p> <p>Conclusion: Conformity</p> <p>Justification:</p> <p>The requirements in the IMG are in line with PEFC ST 1002:2018.</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,	Y	6.3.1.2 <i>The Internal Audit program shall include procedures for the following:</i>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
responsibilities, planning requirements and reporting, which shall take into consideration the importance of the processes concerned and the results of previous audits;		<i>a. planning and implementing internal audits including timing, methods, responsibilities, reporting, risk assessment, and consideration of results from previous audits.</i> Conclusion: Conformity Justification: The requirements in the IMG are in line with PEFC ST 1002:2018.
b) definition of the audit criteria and scope for each audit;	Y	IMG <i>6.3.1.2 b. definition of the audit criteria and scope for each audit;</i> Conclusion: Conformity Justification: The requirements in the IMG are in line with PEFC ST 1002:2018.
c) competence of internal auditor (forest knowledge, standard knowledge);	Y	<i>4.3.1.1 All persons contributing to the IMG Group Management System shall possess sufficient qualifications and knowledge necessary to fully perform assigned roles. Minimum competency requirements shall be established and verified by the Group Entity prior to engaging the services of contributing individuals and entities, including Internal Auditors and Forestry Contractors.</i> Conclusion: Conformity Justification: The requirements in the IMG are in line with PEFC ST 1002:2018.
d) selection of auditors and conducting of audits to ensure objectivity and the impartiality of the audit process;	Y	IMG: <i>6.3.1.2 c. selection of auditors and conducting of audits to ensure objectivity and impartiality of the audit process</i> Conclusion: Conformity Justification:



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		The requirements in the IMG are in line with PEFC ST 1002:2018.
e) ensuring that the results of the audits are reported to relevant group management;	Y	IMG: <i>6.3.1.2 d. ensuring that the audit results are reported to relevant group management;</i>
f) retaining of the documented information as evidence of the implementation of the audit programme and the audit results.	Y	IMG: <i>6.3.1.2 e. retention of documented audit results as evidence for subsequent performance evaluation activities.</i>
9.3 Selection of participants in the internal audit programme		
9.3.1 General		
9.3.1.1 The standard requires the establishment of requirements for the selection of participants in the internal audit programme. These requirements shall include the following procedures for: a) determination of the sample size (9.3.2); b) determination of sample categories(9.3.3); c) distribution of the sample to the categories (9.3.4); d) selection of the participants (9.3.5).	Y	IMG: <i>6.4.2 The Group Entity shall define and implement an annual internal audit sampling protocol for Group Members to determine the sample size, use of sample categories, allocation of the sample to categories and selection of Group Members to be audited.</i> Conclusion: Conformity Justification: The requirements in the IMG are in line with PEFC ST 1002:2018.
9.3.1.2 The standard may define additional requirements on the regional, national or sub-national level.	NA	Conclusion: Not applicable Justification: This is not a requirements in PEFC ST 1002:2018 but a proposal ("may").



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
9.3.1.3 The standard shall define additional sampling requirements in case of participation of pre-existing organisations or group or the members participation, such as a forest owners'/managers' association, SFM programme and submission to tax programming which have their own members.	Y	<p>IMG:</p> <p><i>6.4.4 The Group Entity shall define additional sampling requirements in the case of Group Members participation in pre-existing organizations or groups.</i></p> <p>Conclusion: Conformity</p> <p>Justification:</p> <p>The requirements in the IMG are in line with PEFC ST 1002:2018.</p>
9.3.2 Determination of the sample size		
9.3.2.1 The sample size shall be calculated for the participants of the group organisation.	Y	<p>IMG:</p> <p><i>6.4.3 The Internal Audit sample size for Group Members shall be calculated based on the number of Group Members in accordance with the following: ...</i></p> <p>Conclusion: Conformity</p> <p>Justification:</p> <p>The requirements in the IMG are in line with PEFC ST 1002:2018.</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.	Y	<p>IMG:</p> <p><i>6.4.3 The Internal Audit sample size for Group Members shall be calculated based on the number of Group Members in accordance with the following:</i></p> <p><i>a. The size of the sample should generally be the square root of the number of Group Members, rounded up to the upper whole number.</i></p> <p>Conclusion: Conformity</p> <p>Justification:</p> <p>The requirements in the IMG are in line with PEFC ST 1002:2018.</p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
9.3.2.3 The size of the sample may be adapted by a standard taking into account one or more of the following indicators:		
a) results of a risk assessment. In this case deviations of sample sizes in case of low or high risk for individual categories shall be defined;	Y	<p>IMG:</p> <p><i>6.4.3 c. The size of the sample may be adapted up or down by taking into account any one or more of the following:</i></p> <ul style="list-style-type: none"> <i>results of a risk assessment</i> <p><i>6.4.6 Indicators used in a risk assessment for determination of Group Member sample categories shall reflect the AFF Standards of Sustainability. For each risk indicator used, the conditions for determining risk level (low, medium, high), and the respective consequences for of the up or down adjustments to the Internal Audit sampling, shall be defined.</i></p> <p>Conclusion: Conformity</p> <p>Justification:</p> <p>The requirements in the IMG are in line with PEFC ST 1002:2018.</p>
b) results of internal audits or previous certification audits;	Y	<p>IMG:</p> <p><i>6.4.3 c. The size of the sample may be adapted up or down by taking into account any one or more of the following:</i></p> <ul style="list-style-type: none"> <i>results of Internal Audits or External Certification Audits</i> <p>Conclusion: Conformity</p> <p>Justification:</p> <p>The requirements in the IMG are in line with PEFC ST 1002:2018.</p>
c) quality / level of confidence of the internal monitoring programme;	Y	<p>IMG:</p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p>6.4.3 c. <i>The size of the sample may be adapted up or down by taking into account any one or more of the following:</i></p> <ul style="list-style-type: none"> • <i>quality/level of confidence of Internal Monitoring</i> <p>Conclusion: Conformity Justification: The requirements in the IMG are in line with PEFC ST 1002:2018.</p>
<p>d) use of technologies allowing the gathering of information concerning specified requirements;</p> <p>Note: Such technologies may be e.g. the use of satellite data or drones and allow compliance statements for specific requirements of a sustainability standard or support the risk based sampling.</p>		<p>IMG:</p> <p>6.4.3 c. <i>The size of the sample may be adapted up or down by taking into account any one or more of the following:</i></p> <ul style="list-style-type: none"> • <i>use of technologies allowing gathering of information for specific requirements</i> <p>Conclusion: Conformity Justification: The requirements in the IMG are in line with PEFC ST 1002:2018. Note: The IMG does not define what such technologies may include.</p>
<p>e) based on other means of gathering information about activities on the ground.</p> <p>Note: One way could be a survey with participants who provide some information about their activities on the ground.</p>		<p>IMG:</p> <p>6.4.3 c. <i>The size of the sample may be adapted up or down by taking into account any one or more of the following:</i></p> <ul style="list-style-type: none"> • <i>based on other means of gathering information about activities on the ground</i> <p>Conclusion: Conformity Justification: The requirements in the IMG are in line with PEFC ST 1002:2018.</p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		Note: The IMG does not define what such other means may imply.
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); b) size of management units (different size classes); c) biogeographic region (e.g. lowlands, low mountain range, high mountain range); d) operations, processes and products of potential group participants; e) deforestation and forest conversion; f) rotation period(s); g) richness of biological diversity; h) recreation and other socio-economic functions of the forest; i) dependence of and interaction with local communities and indigenous people; j) available resources for administration, operations, training and research; k) governance and law enforcement.	Y	<p><i>6.4.5 If sample categories are used to amend the standard sample size for Internal Audits of Group Members, the categories shall be established based on the results of a risk assessment. The sample shall be allocated to the categories according to the results of the risk assessment.</i></p> <p><i>6.4.6 Indicators used in a risk assessment for determination of Group Member sample categories shall reflect the AFF Standards of Sustainability. For each risk indicator used, the conditions for determining risk level (low, medium, high), and the respective consequences for of the up or down adjustments to the Internal Audit sampling, shall be defined. The following is a non-exhaustive list of indicators that may be used in the risk assessment.</i></p> <ul style="list-style-type: none"> • Ownership type • Size of Forest Management Unit • Operation, processes, and products of potential group members • Deforestation and forest conversion • Rotation timelines • Biological diversity • Recreation • Ecosystem services of the forest





Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<ul style="list-style-type: none"> • <i>Dependence and interaction with local communities and indigenous people</i> • <i>Available resources for administration, operations, training, and research</i> • <i>Governance and law enforcement</i> <p>Conclusion: Conformity</p> <p>Justification:</p> <p>IMG requires that sample categories shall be based on the results from the risk assessment. IMG include a non-exhaustive list of indicators that may be used in the risk assessment.</p> <p>The IMG list of potential indicators is not fully identical to the PEFC ST 1002:2018. However, the listed indicators in the PEFC ST 1002:2018 are not a requirement, but a proposal ("may").</p>
9.3.3.2 Conditions which constitute risk for each indicator on low, medium and high level and the respective consequences for the sampling shall be defined.	Y	<p>IMG:</p> <p><i>6.4.6 Indicators used in a risk assessment for determination of Group Member sample categories shall reflect the AFF Standards of Sustainability. For each risk indicator used, the conditions for determining risk level (low, medium, high), and the respective consequences for of the up or down adjustments to the Internal Audit sampling, shall be defined...</i></p> <p>Conclusion: Conformity</p> <p>Justification:</p> <p>The requirements in the IMG are in line with PEFC ST 1002:2018.</p>
9.3.4 Distribution of the sample The sample shall be distributed to the categories according to the result of the risk assessment.	Y	<p>IMG:</p> <p><i>6.4.5 If sample categories are used to amend the standard sample size for Internal Audits of Group Members, the categories shall be established based on the results of a risk assessment. The sample shall be allocated to the categories according to the results of the risk assessment.</i></p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		Conclusion: Conformity Justification: The requirements in the IMG are in line with PEFC ST 1002:2018.
9.3.5 Selection of the participants		
9.3.5.1 At least 25% of the sample should be selected at random.	y	 <i>6.4.3 The Internal Audit sample size for Group Members shall be calculated based on the number of Group Members in accordance with the following:</i> <i>b. Twenty-five percent of the sample should be selected at random.</i> Conclusion: Conformity Justification: The requirements in the IMG are in line with PEFC ST 1002:2018.
9.3.5.2 A risk-based procedure for the selection of the participants shall be specified.	y	 <i>6.4.7 A risk-based procedure for the selection of specific Group Members to be included in the Internal Audit sample shall be specified.</i> Conclusion: Conformity Justification: The requirements in the IMG are in line with PEFC ST 1002:2018.



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
9.4 Management review		
9.4.1 The standard requires that an annual management review shall at least include:		
a) the status of actions from previous management reviews;	Y	<p>IMG:</p> <p><i>6.5.1 The Group Entity shall conduct an annual Internal Management Review to include at least the following:</i></p> <p><i>a. the status of actions from previous management reviews;</i></p> <p>Conclusion: Conformity Justification: The requirements in the IMG are in line with PEFC ST 1002:2018.</p>
b) changes in external and internal issues that are relevant to the group management system;	Y	<p>IMG:</p> <p><i>6.5.1 b. changes in external and internal issues relevant to the Group Management System;</i></p> <p>Conclusion: Conformity Justification: The requirements in the IMG are in line with PEFC ST 1002:2018.</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;	Y	<p>IMG:</p> <p><i>6.5.1 c. current status and trends of conformity with the AFF Standards of Sustainability and the Group Management System, including results of internal monitoring, internal audits, and external Certification Audits;</i></p> <p>Conclusion: Conformity Justification: The requirements in the IMG are in line with PEFC ST 1002:2018.</p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
d) information on the group performance, including trends in: i. nonconformities and corrective actions; ii. monitoring and measurement results; iii. audit results;	Y	<p>IMG: <i>6.5.1.c current status and trends of conformity with the AFF Standards of Sustainability and the Group Management System, including results of internal monitoring, internal audits, and external Certification Audits;</i></p> <p>Conclusion: Conformity Justification: The requirements in the IMG are in line with PEFC ST 1002:2018.</p>
e) opportunities for continual improvement.	Y	<p>IMG: <i>6.5.1 d. opportunities for continual improvement.</i></p>
9.4.2 The standard requires that the outputs of the management review shall include decisions related to continual improvement opportunities and any need for changes to the group management system.	Y	<p>IMG: <i>6.5.2 The Internal Management Review shall include decisions related to continual improvement opportunities and any need for changes to the Group Management System.</i></p> <p>Conclusion: Conformity Justification: The requirements in the IMG are in line with PEFC ST 1002:2018.</p>
9.4.3 The standard requires that the group organisation shall retain documented information as evidence of the results of management reviews.	Y	<p>IMG: <i>6.5.3 The Group Organization shall retain Documented Information as evidence of the results of management reviews.</i></p> <p>Conclusion: Conformity Justification: The requirements in the IMG are in line with PEFC ST 1002:2018.</p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
10. Improvement		
10.1 Nonconformity and corrective action		
10.1.1 The standard requires when a nonconformity occurs, the group organisation shall:		
a) react to the nonconformity and, as applicable: i. take action to control and correct it; ii. deal with the consequences;	Y	<p>IMG:</p> <p><i>6.7.2 In the case that corrective actions are required to address identified non-conformities, the Group Entity shall work with the Group Members and other appropriate parties to ensure timely implementation of the corrective action and monitor its effectiveness in maintaining conformity.</i></p> <p>6 4.2.2 The Group Entity shall define and administer a procedure for expelling Group Members if they do not meet the requirements of the AFF Standards of Sustainability and ATFS IMG Standards and are not willing or able to take appropriate corrective action.</p> <p>Conclusion: Conformity</p> <p>Justification:</p> <p>7 The IMG require reaction to nonconformities as well as is having procedures for consequences if a group member do not take appropriate corrective actions.</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: i. reviewing the nonconformity; ii. determining the causes of the nonconformity; iii. determining if similar nonconformities exist, or could potentially occur;	Y	<p>IMG:</p> <p><i>6.7.1 When an External Certification Audit results in a nonconformity, the Group Organization shall conduct an analysis to determine its root cause, determine if similar non-conformities exist or could potentially occur elsewhere, and determine the need for corrective or preventative action to eliminate the causes of the nonconformity such that it does not recur or occur elsewhere.</i></p> <p>Conclusion: Conformity</p> <p>Justification:</p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		The requirements in the IMG are in line with PEFC ST 1002:2018.
c) implement any action needed; d) review the effectiveness of any corrective action taken;	Y	<p>IMG:</p> <p><i>6.7.2 In the case that corrective actions are required to address identified non-conformities, the Group Entity shall work with the Group Members and other appropriate parties to ensure timely implementation of the corrective action and monitor its effectiveness in maintaining conformity.</i></p> <p>Conclusion: Conformity Justification: The requirements in the IMG are in line with PEFC ST 1002:2018.</p>
e) make changes to the group management system, if necessary.	Y	<p>IMG:</p> <p><i>6.7.5 The Group Entity shall keep the Group Organization's Group Management System up-to-date, and make changes as needed to maintain ongoing conformance with the AFF Standards of Sustainability and the ATFS IMG Certification Standards.</i></p> <p>Conclusion: Conformity Justification: The requirements in the IMG are in line with PEFC ST 1002:2018.</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; b) the results of any corrective action.		<p>IMG:</p> <p><i>6.7.4 Documented information shall be retained describing identified non-conformities, implementation of corrective actions, and corresponding results of those actions.</i></p> <p>Conclusion: Conformity Justification:</p>



Indufor

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		The requirements in the IMG are in line with PEFC ST 1002:2018.
10.1.3 The standard requires that a participant who was excluded from a group certification shall be internally audited by the group entity before it is allowed to re-enter the group certification. The internal audit shall not take place sooner than 12 months after the exclusion.	y	<p>IMG:</p> <p><i>4.2.3 Group Members that have been expelled shall be internally audited by the Group Entity prior to re-admittance in the Group Certificate. The internal audit shall not take place sooner than 12 months after the Group Member was removed from the Group Certificate.</i></p> <p>Conclusion: Conformity</p> <p>Justification:</p> <p>The requirements in the IMG are in line with PEFC ST 1002:2018.</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>	y	<p>IMG:</p> <p><i>6.7.6 Group Organizations shall identify and implement measures for the continual improvement of the effectiveness of the Group Management System and the sustainable management of Group Member Forest Management Units included in the certified area.</i></p> <p>Conclusion: Conformity</p> <p>Justification:</p> <p>The requirements in the IMG are in line with PEFC ST 1002:2018.</p>

* If the answer to any question is no, the application documentation shall indicate for each element why and what alternative measures have been taken to address the element in question.

PEFC Checklist (5) - Scheme Administration (PEFC GD 1004:2009)

1. Scope

This checklist is used for the assessment of requirements for the administration of PEFC systems outlined in PEFC 1004:2009, *Administration of PEFC scheme*.

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

The compliance with these requirements is only evaluated in the first PEFC assessment of a system or on specific request by the PEFC Secretariat.

ATFS Reference Documents

Notification	2021 Service Agreement SFI ATFS <i>Annex II: PEFC US Roles and Responsibilities</i>	Normative
Disputes and Appeals	Disputes and Appeals Procedures (undated)	Normative
Abbreviations:	AFF – American Forest Foundation SFI – Sustainable Forestry Initiative CB – certification body	



Indufor

2. Checklist

No.	PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
PEFC Notification of certification bodies			
1.	Are procedures for the notification of certification bodies in place, which comply with chapter 5 of PEFC GD 1004:2009, <i>Administration of PEFC scheme</i> ?	Y	<p><i>2021 Service Agreement SFI ATFS 05.05.21 Annex II</i></p> <p>PEFC CB Notification</p> <p><i>SFI will:</i></p> <ul style="list-style-type: none"> • <i>maintain a current list of accredited:</i> <ul style="list-style-type: none"> a. <i>Certification Bodies (SFM Standards delivering certification audits to the SFI Forest Management Standard, <u>the American Tree Farm Standard</u>, and the Small Lands Group Certification Module) and ...</i> • <i>enter the list and any appropriate revisions to the PEFC International database.</i> • <i>create, revise, and update the notification contract between PEFC US and certification bodies delivering Forest Management and PEFC Chain of Custody audits, and send it to the relevant certification bodies.</i> • <i>communicate with Certification Bodies on notification contracts, current certifications, contact information, interpretations, etc.</i> • <i>collect proof of accreditation for forest management and chain of custody certification bodies.</i> <p>Conclusion: Conformity</p> <p>Justification: The Sustainable Forestry Initiative® (SFI®) acts as the national governing body in the U.S. to the PEFC. ATFS has a formal Services Agreement signed in 2021 outlining the roles and responsibilities of each entity. The responsibilities of SFI include among others, CB notification.</p>



Indufor

No.	PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
PEFC Logo usage licensing			
2.	<p>Are procedures for the issuance of PEFC Logo usage licenses in place, which comply with chapter 6 of PEFC GD 1004:2009, <i>Administration of PEFC scheme</i>?</p> <p>The PEFC Logo usage license shall be issued to an individual legal entity based on the requirements of PEFC ST 2001:2008.</p> <ul style="list-style-type: none"> - ...may issue a PEFC Logo usage multi-license to a holder of a multi-site chain of custody certificate... - The licensing body shall have written procedures for the PEFC Logo licensing - The licensing body shall have a mechanism for the investigation and enforcement of the compliance with PEFC Logo usage rules (PEFC ST 2001:2008) 	NA	<p>ATFS does not include chain of custody procedures or logo licensing.</p> <p>ATFS certified wood, if subject to PEFC logo license, will be traded under the chain of custody and labelling procedures of SFI certification system. PEFC endorsed SFI has own labelling procedures that are not covered by this assessment.</p> <p>Annex II of the 2021 Service Agreement SFI ATFS Jan 1, 2021:</p> <p>SFI, Inc. will <i>customize the PEFC US Logo Use Licensing Agreement and designate a unique logo ID number for each PEFC certified company requesting a logo; forward PEFC logo use guidelines, as well as the PEFC logos to certified companies; approve the logo use to ensure proper use of the logo...; maintain a database on issued PEFC logo and ID numbers.</i></p> <p>Comment: Although chain of custody and PEFC labelling procedures for ATFS certified timber are managed by the SFI scheme, ATFS should describe in scheme description the linkage to the applicable chain of custody standards.</p>
Complaints and dispute procedures			
3.	<p>Are complaint and dispute procedures in place, which comply with chapter 8 of PEFC GD 1004:2009, <i>Administration of PEFC scheme</i>?</p> <p>Quote: <i>1 The PEFC Council and the authorized bodies shall have written procedures for dealing with complaints relating to the governance and administration of the PEFC scheme. 8.2 Upon receipt of the complaint, the procedures shall provide for: a) acknowledgement of the complaint to the complainant, b) gathering and verification of all necessary information, validation</i></p>	Y	<p>American Forest Foundation Disputes and Appeals Procedures (undated document)</p> <p><i>6. All complaints and appeals shall be addressed in writing to the AFF president</i></p> <p><i>6.3. a) acknowledge to the complainant/appellant (in writing) the receipt and subject of the complaint/appeal or rejection of the complaint/appeal with justification...</i></p> <p><i>b) provide ...with details of AFF's complaints and appeals procedures...</i></p>



Indufor

No.	PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
	<p><i>and impartial evaluation of the complaint, and decision making on the complaint,</i> <i>c) formal communication of the decision on the complaint and the complaint handling process to the complainant and concerned parties</i></p>		<p><i>4.4. it is the responsibility of the complainant to submit written information supporting the complaint which can be verified as accurate and correct through an independent source.</i></p> <p><i>7.1 If complaint relates to the activities of CFf state committee, ISRP or NSIC the president shall ... notice the body and ask ...within 30 days a full account how the complaint has been dealt with and the outcome</i></p> <p><i>7.2. If the report has not been received ... or matter relates to AFF, the president shall ...with the BOD executive committee, assign an ad-hoc Task Force Group (TFG) (1- more persons).</i></p> <p><i>7.3 TFG shall submit (within a month) a written report to the AFF BOD Chairman and the AFF president shall present it to the BOD.</i></p> <p><i>7.4. The BOD shall approve or disapprove the conclusions, including recommendations.</i></p> <p><i>7.5. The president shall inform the complainant and other interested parties of the outcomes... in writing...</i></p> <p><i>7.6. American Indian Tribes act define own negotiation bodies according to US Federal Law. If a formal complaint is received from American Indian Tribe regarding legal ownership, tenure or long-term use rights ... The president shall direct the involved parties to ... available legal channels.</i></p> <p>Conclusion: Conformity</p> <p>Justification: Disputes and Appeals Procedures" are written procedures for dealing with complaints connected to standard setting and "<i>other issues relating to AFF</i>". Procedures for acknowledgement of the complaint, verification of data, decision-making and communication of the final decision correspond to those specified in chapter 8 of PEFC GD 1004:2009.</p>



Indufor



Indufor Oy
Helsinki, Finland

Indufor Oy
Shanghai, China

Indufor Asia Pacific Ltd
Auckland, New Zealand

Indufor North America LLC
Washington DC, USA

Indufor Asia Pacific (Australia) Pty Ltd
Melbourne, Australia

indufor@induforgroup.com
www.induforgroup.com

