



Assessment of the NCCF's Trees outside Forests (ToF) against the requirements of the PEFC Council

Final Report, 15 July 2022



Woodmotion

TJConsulting, a part of **Wood motion, S.A.R.L.**

160B, rue de Kirchberg, L – 1858 Luxembourg ▪
T. + 352 661 214 034 ▪ tymrak@tj-consult.com

Wood motion S.A.R.L., Autorisation d'établissement 10071251
TVA 20162436 210, No. Ident. LU 28773486
BIL Banque Internationale à Luxembourg
LU48 0020 4101 3358 3500 / BILLLULL

Content

| | |
|---|--------|
| Abbreviations | 4 |
| 1 Background | 5 |
| 2 Objective..... | 5 |
| 3 Impartiality claim..... | 5 |
| 4 Recommendation | 6 |
| 5 Executive Summary | 7 |
| 6 Referenced documentation | 11 |
| 7 Methodology and timetable | 15 |
| 7.1 Scope of the assessment | 15 |
| 7.2 Assessment process..... | 15 |
| 7.3 Classification of non-conformities..... | 16 |
| 8 Assessment | 17 |
| 8.1 General analysis of the structure of the scheme | 17 |
| 8.2 Assessment of requirements for standard setting | 20 |
| 8.2.1 Assessment of the standard setting procedures..... | 20 |
| 8.2.2 Assessment of the standard setting process | 22 |
| 8.2.3 Stakeholders questionnaire | 31 |
| 8.2.4 Stakeholders interviews..... | 32 |
| 8.3 Requirements for group certification | 34 |
| 8.3.1 Introduction | 34 |
| 8.3.2 Group certification model..... | 34 |
| 8.4 Trees outside Forests standard..... | 37 |
| 8.4.1 Introduction and summary | 37 |
| 8.4.2 Assessment of the ToF standard | 43 |
| 8.5 Chain of custody requirements..... | 51 |
| 8.6 Requirements for certification bodies | 52 |
| 8.6.1 Requirements for chain of custody certification bodies | 52 |
| 8.6.2 Requirements for forest management certification bodies | 53 |
| Annex A: Detailed assessment of the standard setting procedures and the standard setting process | 58 |
| Annex B: Detailed assessment of the group certification model | 110 |
| Annex D: Detailed assessment of the Trees outside Forests (ToF) standard | 146 |
| Annex D: Stakeholder's representation in the SDG and TWG | 204 |
| Annex E: Comments from the PEFC Council's international consultation | 207 |
| Annex F: Stakeholder's survey (FORM used in the survey)..... | 208 |
| Annex G: Report from in-country visit | 210 |
| Annex H: Comments from PEFC Council's internal review of the report | 212 |

Abbreviations

| | |
|------|---|
| BA | Block Agroforest |
| BoD | Board of Directors |
| BWI | Building and Woodworkers International |
| CoC | Chain of Custody |
| DRC | Dispute Resolution Committee |
| EA | European Cooperation for Accreditation |
| IAF | International Accreditation Forum |
| ILO | International Labour Organisations |
| ISO | International Standardisation Organisation |
| LMU | Land Management Unit |
| MoA | Ministry of Agriculture and Farmers Welfare |
| NBA | Non Block Agroforest |
| NWPs | Non-wood products |
| PEFC | Programme for the Endorsement of Forest Certification |
| RAT | Risk Assessment Tool |
| SDG | Standard Development Group |
| ToF | Trees outside forests |
| TWG | Technical Working Group |
| UTF | Urban Trees and Forests |

1 Background

Network for Conservation and Certification of Forests (NCCF, India) (here-in-after “the applicant”) has submitted its forest certification scheme (here-in-after “the scheme”), respectively its part relating to certification of ToF (see chapter 6) for mutual recognition and endorsement by the PEFC Council.

Following the PEFC Council’s procedures identified in PEFC GD 1007:2017, the PEFC Council selected TJConsulting to carry out an independent and impartial assessment of the scheme documentation against the PEFC Council requirements.

2 Objective

The objective of this assessment is to:

- a) Identify conformities and non-conformities of the scheme’s documentation with the PEFC Council requirements;
- b) Provide the PEFC Council Board of Directors with a recommendation on the endorsement of the submitted scheme’s documentation.

3 Impartiality claim

As the consultant for this assessment, neither TJConsulting nor Mr Jaroslav Tymrak (Principal of TJConsulting) has a vested interest in the development or the management of the scheme; was not involved by consulting or any other means in the development of the scheme and has not provided any other consultancy services to the applicant.

TJConsulting was committed to undertake its assessment of the scheme based solely on submitted information and factual evidence in a professional and impartial manner.

4 Recommendation

Following the evaluation of the “scheme” against the PEFC Council’s requirements, TJConsulting **recommends to the PEFC Council Board of Directors:**

- a) **to note minor non-conformities** (No. 1-4) with the PEFC Council’s requirements relating to the standard-process without the need of any corrective action¹;
- b) **to request the NCCF to resolve 4 minor non-conformities** with the PEFC Council requirements; for standard setting process (No. 5), ToF Standard (No. 6), CoC certification bodies (No 7) and SFM/ToF certification bodies (No. 8);
- c) **to recommend the scheme** for PEFC endorsement.

| List of non-conformities | | |
|--------------------------|---|--|
| 1 | Identification of disadvantaged stakeholders (PEFC ST 1001:2017, 6.2.3) | Standard setting process |
| 2. | Public announcement of the start of the process (PEFC ST 1001:2017, 6.3.1, 6.3.2) | |
| 3. | Balanced representation on the SDG – lacking representation of “workers and trade unions” (PEFC ST 1001:2017, 6.4.2a) | |
| 4. | Second public consultation (PEFC ST 1001:2017) | |
| 5. | Specification of the review date in the ToF Standard (PEFC ST 1001:2017, 7.2.2d) | |
| 6 | Indigenous people (PEFC ST 1003:2018, 6.2.3.2) | ToF standard |
| 7 | Reference to PEFC ST 2003:2013 ² | CoC certification bodies |
| 8 | Risk Assessment Tool (RAT) ³ | Forest management / ToF certification bodies |

¹ TJConsulting does not recommend to resolve the minor non-conformities (1-4) relating to the standard setting process as this would require the applicant to repeat a significant part of the standard setting process. Therefore, the minor non-conformity should be taken into consideration and resolved during the next regular revision of the scheme.

² The applicant communicated^[51] that the reference in the documentation would be revised. However, no revised document has been submitted until completion of the assessment..

³ The applicant communicated^[51] that the RAT module will be deleted from the scheme. The reference to the RAT in the ToF Standard has been deleted. However, the reference still remains in NCCF-STD-ACR-TOF 1/2019 as no revised document has been submitted until completion of the assessment.

5 Executive Summary

The assessment of the scheme, including evaluation of the scheme documentation and records; reviewing stakeholders' survey, interviewing key stakeholders and managers of the scheme resulted in the following conclusions that are organised according to the main parts of the PEFC Council requirements.

5.1 Standard setting procedures

The standard setting is governed by NCCF-STD- SSP-TOF 02/2022 (*Requirements for Standard Setting Process*) that is largely based on PEFC ST 1001:2017 and by NCCF - STD- DRP-TOF 01 /2019 (*Procedures for complaints and appeals investigation and resolution*).

The scheme's standard setting procedures **comply with** PEFC ST 1001:2017.

Details about the assessment and the scheme compliance can be found in chapter 8.2.2 and Annex A of this report.

5.2 Standard setting process

The standard setting process lasted three years from June 2016 until the formal launch of the ToF Standard in August 2019. The process engaged a large number of stakeholders, was open and transparent and resulted in consensus amongst the participating stakeholders.

The standard setting process **complies with** the PEFC requirements (PEFC ST 1001:2017), except the following minor non-conformities.

| | |
|----|---|
| 1 | Identification of disadvantaged stakeholders (PEFC ST 1001:2017, 6.2.3) |
| 2. | Public announcement of the start of the process (PEFC ST 1001:2017, 6.3.1, 6.3.2) |
| 3. | Balanced representation on the SDG – lacking representation of “workers and trade unions” (PEFC ST 1001:2017, 6.4.2a) |
| 4. | Second public consultation (PEFC ST 1001:2017) |
| 5. | Specification of the review date in the ToF Standard (PEFC ST 1001:2017, 7.2.2d) |

It should be noted that the standard setting process started in 2016 before the publication of PEFC ST 1001:2017. Therefore, those stages of the process that were conducted before November 2017 and did not conform to a new requirement of PEFC ST 1001:2017 (for requirements not included in PEFC ST 1001:2010), the assessment reported the issue as “justified non-conformities”:

- Risk assessment as a part of the Standard Proposal (PEFC ST 1001:2017, 6.1.1d)
- Reference to Project Proposal in the Public announcement (PEFC ST 1001:2017, 6.3.1).

Details about the assessment and the scheme compliance can be found in chapter 8.2.3, 8.2.4 and Annex A of this report.

5.3 Group ToF certification

The scheme allows group certification as a certification model that is suitable to the small land owners in India. The requirements for group certification are defined in NCCF -STD-GM-TOF 02 /2022 (*Group Certification Standard for ToF certification*).

The scheme documentation for the group certification **complies** with the PEFC requirements (PEFC ST 1002).

Details about the assessment and the scheme compliance can be found in chapter 8.3 and Annex B of this report.

5.4 ToF Standard

The requirements for ToF are defined in NCCF-STD-TOF-02/2022 (*Trees Outside Forest (ToF) Certification Standard*).

NCCF-STD-TOF-02/2022 is logically structured and the standard's concept is used consistently throughout the document. The document is of very high quality concerning its detail, consistency, usage of terms and references to external documentation. It includes detailed management system as well as performance-based requirements, its wording is unambiguous and allows the standard to be used for conformity assessment activities.

NCCF-STD-TOF-02/2022 **complies** with the requirements of PEFC ST 1003, except for the following non-conformity:

6 Indigenous people (PEFC ST 1003:2018, 6.2.3.2)

The ToF Standard includes a requirement for tenure, land leasing or use rights. The ToF Standard also defines requirements for dispute resolution over the land rights. This also implicitly covers the rights of indigenous people.

However, the ToF Standard does not include an explicit requirement for indigenous peoples. A note to the requirement 1.3 states that the issue indigenous people in India is only relevant to the management of forests with the reference to the Forest Rights Act (FRA) 2006.

India has not ratified the ILO Convention 169⁴ and voted in favour of the UN Declaration on the Rights of Indigenous Peoples, 2007⁵.

India is not using the term "indigenous people". Instead, the Indian Constitution calls the aboriginal tribal groups "Scheduled Tribes" (also known as the "Adivasi"). It is reported that the Schedule Tribes represent 8.6 % of the Indian population⁶. More than half of the tribal population resides in six states of Northeast India.: Madhya Pradesh, Chhattisgarh, Maharashtra, Orissa, Jharkhand and Gujarat. The Northeast of India has a particularly heavy tribal element. These ancient aboriginal peoples tend to live in isolated communities in hills and forestlands, far from urban centres⁷. The scheduled tribes

⁴ https://www.ilo.org/dyn/normlex/en/f?p=1000:11200:0::NO:11200:P11200_COUNTRY_ID:102691

⁵ <https://www.un.org/development/desa/indigenouspeoples/declaration-on-the-rights-of-indigenous-peoples.html>

⁶ <https://www.un.org/development/desa/indigenouspeoples/declaration-on-the-rights-of-indigenous-peoples.html>

⁷ [Indigenous Peoples of India – Indigenous Peoples Literature \(wordpress.com\)](https://www.wordpress.com/indigenous-peoples-of-india/)

living in the Northeast greatly depend on land and forest for their livelihood through agriculture particularly shifting cultivation, food gathering and hunting⁸.

The omission of specific requirements relating to indigenous peoples (scheduled tribes) in India is **largely justified** and the issue of indigenous peoples have only **limited effect on the management** of ToF, taking into account the following facts:

- a) Most of the scheduled tribes are forest dependent communities, using forest resources for their livelihood; Their rights within the forest boundaries are well regulated and protected by legislation, Forest Rights Act (FRA) 2006. The issue is outside the scope of the ToF management;
- b) ToF management within the Indian context is mainly focused on small holders which are not affected by the scheduled tribes' rights;
- c) Scheduled Tribes rights are subject to governmental regulations⁹ activities and concerns. It has created a special Ministry of Tribal Affairs¹⁰ and National Commission for Scheduled Tribes¹¹.
- d) Issues relating to customary rights or disputes over the land use and tenure rights relating to the scheduled tribes can be resolved by the Criterion 1.3 of the Standard.

Details about the assessment and the scheme compliance can be found in chapter 8.4 and Annex C of this report.

5.5 Chain of custody requirements

The applicant has formally adopted the PEFC International chain of custody standard (PEFC ST 2002) as a part of the scheme and as such **complies** with the PEFC requirements.

Details about the assessment and the scheme compliance can be found in chapter 8.5 of this report.

5.6 Requirements for chain of custody certification bodies

The applicant is making reference to the PEFC international standard for CoC certification bodies (PEFC ST 2003:2013) in NCCF ST NCB TOF 1/2019. Annex to NCCF STD NCB TOF 1/2019 makes dated reference to PEFC ST 2003:2013 that was however revised and replaced by PEFC ST 2003:2020. The NCCF document has been adopted in 2019 before the publication of the latest edition of the PEFC International Standard and as such includes reference to the edition valid at that time.

As the NCCF document uses “dated reference”, the NCCF should revise NCCF STD NCB TOF 1/2019 and make reference to the latest edition of PEFC ST 2003 (2020) or to use “undated reference” with listing of the document under normative references and clear explication of the application if “undated normative reference” (See for example ISO standards).

On the other hand, it should be noted that PEFC ST 2003:2020 includes a clear and explicit statement that the document replaces the previous version PEFC ST 2003:2013. As such,

⁸

https://www.academia.edu/75283445/Land_Agriculture_and_Livelihood_of_Scheduled_Tribes_in_North_East_India

⁹ THE SCHEDULED CASTES AND THE SCHEDULED TRIBES (PREVENTION OF ATROCITIES) ACT, 1989

¹⁰ [Ministry of Tribal Affairs - Government of India](#)

¹¹ [National Commission for Scheduled Tribes | Government of India \(ncst.nic.in\)](#)

regardless of wording of NCCF STD NCB TOF 1/2019, the certification and accreditation bodies are not allowed to use PEFC ST 2003:2013 after its replacement of the new edition, respectively after given transition period.

The applicant is meeting the PEFC requirements for CoC certification bodies except the following minor non-conformity:

7 Reference to PEFC ST 2003:2013

Details about the assessment and the scheme compliance can be found in chapter 8.6.1 of this report.

5.7 Requirements for forest management / ToF certification bodies

The scheme's requirements for forest management certification bodies, their accreditation and notification **comply** with the Annex 6 of the PEFC Technical Document **except for the RAT (Risk assessment Tool) approach that is unable to meet the requirements of Annex 6** (mainly because Annex 6 approach is fundamentally different than the RAT approach).

The PEFC Council Board of Directors should make a decision on whether or not to make an ad hoc endorsement of the RAT approach within the NCCF certification scheme for the ToF certification.

The RAT module is an innovative approach to deliver "certified material" from an area with ToF management. When the RAT evaluation results in "Low Risk", it practically replaces the ordinary ToF certification based on ISO/IEC 17065 and allows wood from the defined area to enter the PEFC chain of custody as certified material.

The RAT approach (when resulting in "low risk") results in procedures that **lack some fundamental** features of third-party conformity assessment (certification) as defined by ISO/IEC 17065 (and also ISO/IEC 17021).

The evaluation of the module against Annex 6 of the PEFC Technical Document is practically impossible as Annex 6 is strictly focused on third-party conformity assessment (certification) approach. Therefore, any PEFC endorsement of the RAT approach shall be based either on:

- a) An ad-hoc decision of the PEFC Council or
- b) A set of benchmark requirements developed by the PEFC Council for the purposes of "Risk based evaluation of wood sourcing".

The applicant is meeting the PEFC requirements for forest management (ToF) certification bodies except the following minor non-conformity:

8 Risk Assessment Tool (RAT)

Details about the assessment and the scheme compliance can be found in chapter 8.6.2. of this report.

6 Referenced documentation

The following documents have been used for the assessment and are referenced in this report:

PEFC Council requirements:

PEFC ST 1001:2017: Standard setting - Requirements

PEFC ST 1002:2018: Group forest management certification – Requirements

PEFC ST 1003:2018: Sustainable forest management – Requirements

PEFC ST 2001:2020: PEFC Logo Usage Rules - Requirements

PEFC ST 2002:2020: Chain of custody of forest based products – Requirements

PEFC ST 2003:2020: Requirements for certification bodies operating chain of custody certification against the PEFC Council international chain of custody standard

Annex 6 of the PEFC Technical Document: Certification and Accreditation Procedures

PEFC GD 1007:2017 Endorsement and Mutual Recognition of National Systems and their Revision

The scheme's documentation

The assessment of the scheme was based on the following documentation provided by the PEFC Council already in 2020 and revised during the course of the assessment, and additional information provided by the applicant during the assessment process.

Submitted scheme documentation

| | |
|-----------------------------|--|
| NCCF-STD-TOF-02/2022 | Trees Outside Forest (ToF) Certification Standard (20/5/2022) |
| NCCF-STD-DRP-ToF 01/2019 | Procedures for complaints and appeals investigation and resolution |
| NCCF-STD-NCB-ToF 01/2019 | Procedure for PEFC Notification of Certification Bodies Operating NCCF Trees outside Forests Certification and Chain of Custody Certification |
| NCCF-STD-LOGO-ToF 01/2019 | NCCF Logo usage requirements |
| NCCF-STD-SSP-ToF 02/2022 | Requirements for Standard Setting Process (20/5/2022) |
| NCCF -STD- ACR-ToF 01 /2019 | Accreditation and Certification Requirements for CBs under NCCF ToF Certification Scheme |
| NCCF-STD-GM-ToF 02 /2022 | Group Certification Standard (20/5/2022) |
| NCCF-GD-RAT-ToF 01/2021 | Guide to Auditing and Certification Procedure using Risk Assessment Tool under NCCF ToF Certification Scheme (withdrawn during the assessment) |

Other supporting scheme documentation:

Development report

PEFC Checklists

Records on the standard setting process referenced in the assessment

(The references to the following records and evidences are made throughout the report. The references with links to online sources are valid as visited on 12 April 2022)

- [1] [Availability of the NCCF' standard setting procedures at the NCCF's website](#)
- [2] Minutes of the SDG meeting (7 April 2017)
- [3] A list of stakeholders (March 2017)
- [4] A list of stakeholders (an actual version)
- [5] Reminder email to stakeholders concerning the public consultation (13 June 2018)
- [6] ToF public consultation – comments received
- [7] [Publication of the public consultation received comments and responses](#)
- [8] Summary of NCCF's responses to the assessor's request for information
- [9] Concept note paper
- [10] Project proposal for the ToF standard development
- [11] Expression of Interest (Eol) for participation in the SDG
- [12] [Publication of the Eol for participation in the SDG at the NCCF's website](#)
- [13] Eol received from two organisations
- [14] Communication with two organisations related to Eol
- [15] Minutes of the SDG meeting 7 April 2017
- [16] Minutes of the SDG meeting 16 February 2019
- [17] E-mail invitation to the SDG meeting 7 April 2017
- [18] E-mail invitation to the SDG meeting 16 February 2019
- [19] Agenda of the SDG meeting 7 April 2017
- [20] Agenda of the SDG meeting 16 February 2019
- [21] Email distribution of the minutes of the SDG meeting 7 April 2017
- [22] Email distribution of the minutes of the SDG meeting 16 February 2019
- [23] Agenda – Minutes TWG ToF IV
- [24] Agenda TWG ToF XVII
- [25] Email invitation TWG ToF XVII
- [26] Email distribution minutes TWG ToF XVII
- [27] Minutes TWG ToF XVII
- [28] Comments table on ToF standard v 1.1
- [29] Comments from MoA (Ministry of Agriculture and Farmers Welfare)
- [30] NCCF' response to MoA
- [31] [Announcement of the public consultation at the NCCF's website](#)
- [32] Public consultation – e-mail reminder (13 June 2018)
- [33] Agenda of the TWG meeting 20-21 July 2018
- [34] Minutes of the TWG meeting 20-21 July 2018
- [35] Table consideration of comments from public consultation
- [36] [Publication of the table of consideration of comments from public consultation](#)
- [37] [Expression of interest of participation in pilot testing](#)

- [38] Pilot testing New Delhi summary
- [39] Pilot testing New Delhi Checklist
- [40] Pilot testing Rajasthan Delhi summary
- [41] Pilot testing Rajasthan Checklist
- [42] Pilot testing Tamil Nadu Checklist
- [43] Pilot testing Saharanpur summary report
- [44] Pilot testing Saharanpur Checklist
- [45] Minutes of the NCCF's Governing Body, 10 August 2019
- [46] [Publication of the ToF standard at the NCCF's website](#)
- [47] [Development report published at the NCCF's website](#)
- [48] Copies of email correspondence with stakeholders relating to invitation to the process (July, August, October 2016)
- [49] Copies of emails to stakeholders relating to public consultation (2018)
- [50] Invitation of stakeholders – extension of the SDG, email, 5 October 2016
- [51] NCCF response to the Draft Interim Report, 17 May 2022
- [52] Emails to stakeholders re public consultation, 2018
- [53] Minutes of the TWG meeting, 20/7/2018
- [54] Minutes of the SDG meeting, 16/2/2019
- [55] Consultation with governmental bodies, emails, 2019

7 Methodology and timetable

7.1 Scope of the assessment

The assessment was carried out based on PEFC GD 1007:2017 and the TJConsulting's tender proposal of 8 November 2021.

The assessment that resulted in the report was carried out as a desk-top exercise based on the documentation that was provided by the applicant (see chapter 6). The standard setting process as well as non-conformities identified in a draft interim report were verified by stakeholders interviews conducted during the in-country visit.

7.2 Assessment process

Table 1 describes the assessment process that is based on and fully conforms to PEFC GD 1007 and the tender dossier of 8 November 2021.

Table 1: Stages of the assessment process

| Stage | Description | Output | Time / Period |
|--------------------------------|--|--|-------------------------------|
| Start of the assessment | The start of the assessment was announced by the PEFC Council. TJConsulting provided the PEFC Council and the applicant with the specific dates/deadlines of the assessment in compliance with this proposal. | The start announcement | 28 Feb 2022 |
| Stage 1 assessment | In the beginning of the assessment, TJConsulting made a request for the referenced records and additional documentation that is necessary for the assessment of the scheme against the PEFC requirements, including translation needs. Stage 1 assessment also included distribution of the stakeholders' questionnaire and its analysis. | Interim report | 28 Feb 2022– 12 April 2022 |
| Comment period | The PEFC Council and the applicant were provided with the interim draft report with possibilities to submit comments, responses, clarifications or changes to the scheme documentation. | The applicant's response to the interim report | 13 April 2022 – 20 May 2022 |
| In-country visit | In-country visit and interview of the applicant's staff / key persons/stakeholders | A report on the in-country visit | 18-22 April 2022 |
| Stage 2 assessment | Stage 2 covered consideration of the applicant's responses as well as | Final draft report | 20 May 2022 – 4 June 2022 |

| Stage | Description | Output | Time / Period |
|---|--|--------------------------------|----------------------------|
| | comments received from the PEFC international public consultation | | |
| Stakeholders consultation | TJConsulting analysed stakeholders' comments resulting from direct invitation of Dutch stakeholders | Final draft report | 9 March 2022 – 20 May 2022 |
| PEFC Council's internal review | The Final draft report reviewed by the PEFC Council. The PEFC Council will provide TJConsulting with its comments. | Comments from the PEFC Council | 4 June – 9 July 2022 |
| Consideration of the PEFC Council's comments | The assessor reviewed PEFC Council comments and amended the report as appropriate. | Final report | 9 July – 15 July 2022 |

7.3 Classification of non-conformities

The assessment provides for three types of decision relating to the scheme conformity with the PEFC Council's requirements as indicated in chapter 6.2.2 of PEFC GD 1007.

- Major nonconformity:** The nonconformity against a specific PEFC requirement has a high impact on achieving the intended outcome of the PEFC Sustainability Benchmark.
- Minor nonconformity:** The nonconformity against a specific PEFC requirement has a low impact on achieving the intended outcome of the PEFC Sustainability Benchmark.
- Conformity:** A procedure described by the system documentation fully meets the particular requirement of the PEFC Sustainability Benchmark.

In addition to the conformity statements above, the report also includes "observations" that are, however, not causing non-conformities with the PEFC requirements.

8 Assessment

8.1 General analysis of the structure of the scheme

The scheme documentation

The scheme documentation contains seven (7) NCCF standards that have been developed by the NCCF and three (3) international PEFC Council standards that have been adopted by the NCCF.

| Document | | PEFC endorsed 2019 | ToF endorsement 2022 |
|---------------------------------|---|-----------------------------|----------------------------|
| NCCF -STD- DRP- TOF 01 /2019 | Procedures for complaints and appeals investigation and resolution | YES (version 9/9/2017) | YES |
| NCCF-STD-FM- 01/2017 | Forest Management Certification Standard | YES | |
| NCCF-STD-TOF- 02/2022 | Trees Outside Forest (ToF) Certification Standard | | YES |
| NCCF -STD- NCB- 01/2017 | Procedure for PEFC Notification of Certification Bodies Operating Forest Management System and Chain of Custody Certification | YES (version 9/9/2017) | |
| NCCF-STD-NCB- TOF 01/2019 | Procedure for PEFC Notification of Certification Bodies Operating NCCF Trees outside Forests Certification and Chain of Custody Certification | | YES |
| NCCF-STD-LOGO- TOF 01/2019 | NCCF Logo usage requirements | YES (version 15/3/2018) | YES |
| NCCF-STD-SSP- TOF 02/2022 | Requirements for Standard Setting Process | YES (version 12/12/2018) | YES |
| NCCF -STD- ACR- 01/2018 | Accreditation and Certification Requirements for the CBs under NCCF FM Certification Scheme | YES (version 12/12/2018) | YES |
| NCCF-STD-ACR- TOF 01/2019 | Procedure for PEFC Notification of Certification Bodies Operating NCCF Trees outside Forests Certification and Chain of Custody Certification | | YES |
| NCCF-STD-GM- 02/2018 | Group Certification Standard | YES (version 12/12/2018) | |
| NCCF-STD-GM-TOF 02/2022 | ToF Group Management Certification Standard | | YES |

| | |
|---------------------------------|--|
| PEFC ST 2001:2020 ¹² | PEFC Logo usage rules – Requirements |
| PEFC ST 2002:2020 | Chain of custody of forest based products – Requirements |
| PEFC ST 2003:2013 | Requirements for Certification Bodies operating Certification against the PEFC International Chain of Custody Standard |

The scheme is logically structured following the requirements of the PEFC Council documentation. Each of the following processes are covered by a separate and distinct documentation.

| Process | Documentation | SFM | ToF |
|----------------------------------|-----------------------------|-----|-----|
| Standard setting | NCCF -STD- SSP-TOF | ● | ● |
| Forest / TOF management | NCCF -STD- FM | ● | |
| | NCCF-STD-ToF | | ● |
| Group forest / TOF certification | NCCF-STD- GM | ● | |
| | NCCF-STD- GM-TOF | | ● |
| Chain of custody | PEFC ST 2002:2020 | | |
| PEFC Trademark usage | PEFC ST 2001:2020 | ● | ● |
| Certification and accreditation | NCCF -STD- ACR | ● | |
| | NCCF -STD- ACR-TOF | | ● |
| | NCCF -STD- NCB | ● | |
| | NCCF -STD- NCB-TOF | | ● |
| | PEFC ST 2003:2013 (for CoC) | | |
| Dispute resolution | NCCF -STD- DRP-TOF | ● | ● |

Observation

The NCCF scheme includes some documents that are common for both SFM and ToF certification, respectively for the whole scheme, e.g. dispute settlement, standard setting procedures. However, the identification of the documents includes “TOF” sign that can give an impression that the documents only apply to ToF certification.

¹² The PEFC international documents PEFC ST 2001, PEFC ST 2002 and PEFC ST 2003 were adopted by the applicant without modification.

Organisational arrangement

The following bodies are involved in the development and implementation of the NCCF scheme. The scheme keeps strict separation of organisations involved in the scheme development and operations.

| | |
|---|--|
| The NCCF | <p>The Standard setting body/the scheme owner</p> <ul style="list-style-type: none"> - Develops and manages the NCCF scheme; - Notifies (formally recognises) the certification bodies; - Issues the PEFC Logo licenses in India. <p>For the purposes of the development of the forest management standard, the NCCF forms the SDG and TWG.</p> |
| Certification body | <p>Certification bodies are responsible for auditing of forest management and chain of custody and issuance of the certificates.</p> <p>The certification body is an independent third party that shall be accredited by an accreditation body that is a member of the IAF.</p> |
| Accreditation body | <p>The accreditation body evaluates competencies and impartiality of the involved certification bodies and makes surveillance of their activities.</p> <p>The NCCF requires the accreditation body to be a signatory to the IAF multilateral agreement on product certification and explicitly specifies that the accreditation is provided by NABCB, the Indian national accreditation body.</p> |
| Forest / ToF owner / management company / group of forest / ToF owners | <p>Forest owners / managers are responsible to implement the forest management standard and comply with it.</p> <p>They are clients to the certification body and recipients of the forest management certificate.</p> |
| Processing / trading companies | <p>The companies are responsible to implement the chain of custody standard (PEFC ST 2002:2020) and comply with it.</p> <p>They are clients to the certification body and recipients of the chain of custody certificate.</p> |

8.2 Assessment of requirements for standard setting

8.2.1 Assessment of the standard setting procedures

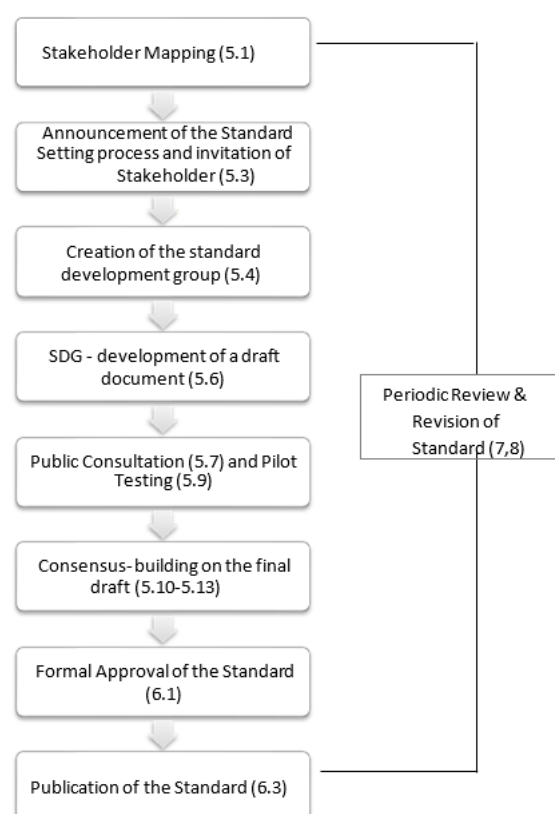
A. Procedures for the standard setting process

The standard setting of the NCCF is regulated by the NCCF's standard setting procedures (NCCF STD SSP TOF 02/2022). The procedures have been revised during the evaluation process to address non-conformities identified in a draft interim report.

The standard setting procedures are logically structured and follow the process approach defined in PEFC ST 1001:2017, it largely uses its structure and wording.

NCCF STD SSP TOF 02/2022 includes procedural requirements for:

- a) Identification of stakeholders, including stakeholder groups, their key issues and means of communication, key and disadvantaged stakeholders, their constraints and means of resolving them;
- b) Announcement of the standard setting in media as well as by direct communication with stakeholders, providing information about the planned process and inviting stakeholders to submit their nominations to the SDG (Working Group);
- c) Establishment of the SDG and TWG (Technical Working Group);
- d) Development of the standard by the SDG;
- e) Two months public consultation announced in media as well as by direct communication to stakeholders, consideration of their comments and making summary of the comments and their consideration publicly available; and additional one-month public consultation for new standards;
- f) Pilot testing;
- g) Decision making of the SDG and building consensus;
- h) Formal approval of the standard by the NCCF's Governing Body and its publication;
- i) Review and revision of standards, including classification of revisions.



Working group/committee for the development of the standard

NCCF STD SSP TOF 02/2022 requires that the NCCF establishes the SDG (the Standard Development Group) based on nominations of relevant stakeholders and for its composition it makes reference to the stakeholder groups defined by the UN Agenda 21 and balanced representation of economic, social and environmental interests.

NCCF STD SSP TOF 02/2022 does not define specific voting procedures or thresholds but refers to the general definition of consensus applied by ISO Guide 59 and any majority voting shall not overrule the consensus requirements. It requires to identify through voting or other means whether or not there is a sustained opposition of an SDG member and to resolve any apparent oppositions.

Public consultation

NCCF STD SSP TOF 02/2022 requires 60 days public consultation that is communicated to stakeholders via website and by direct mailing. The received comments shall be duly considered by the SDG and results of the consideration incorporated into a draft standard. The comments as well as outcomes if their consideration shall be made public.

Development of a new standard also requires a second public consultation that shall last at least 30 days.

Dispute settlement procedures

NCCF STD SSP TOF 02/2022 makes reference to the NCCF's specific document on resolution of complaints and appeals (NCCF STD DRP TOF 01/2019). This document provides comprehensive procedures for the resolution of all complaints and appeals relating to the activities of the NCCF, including the standard setting.

Therefore, the NCCF's documentation includes procedures for

- a) Receipt of the complaint/appeal and communication to the complainant/appellant;
- b) Investigation and resolution of the complaint/appeal;
- c) Communication on the results of the complaint/appeal.

Review and revision of the standards

The NCCF standards (SFM and ToF) shall be reviewed no later than five years from the formal approval of the standard. The review process includes consideration of a feedback on the standard implementation, gap analysis and public consultation.

The revision of the standard that follows the review shall follow the process of the initial development of a standard. The revision can be conducted as normal periodic revision, time editorial and time-critical revision.

Results of the assessment

NCCF STD SSP TOF 02/2022 **fully complies** with PEFC ST 1001:2017.

For more information and detailed assessment, please refer to Annex A of the report.

8.2.2 Assessment of the standard setting process

Scope of the assessment

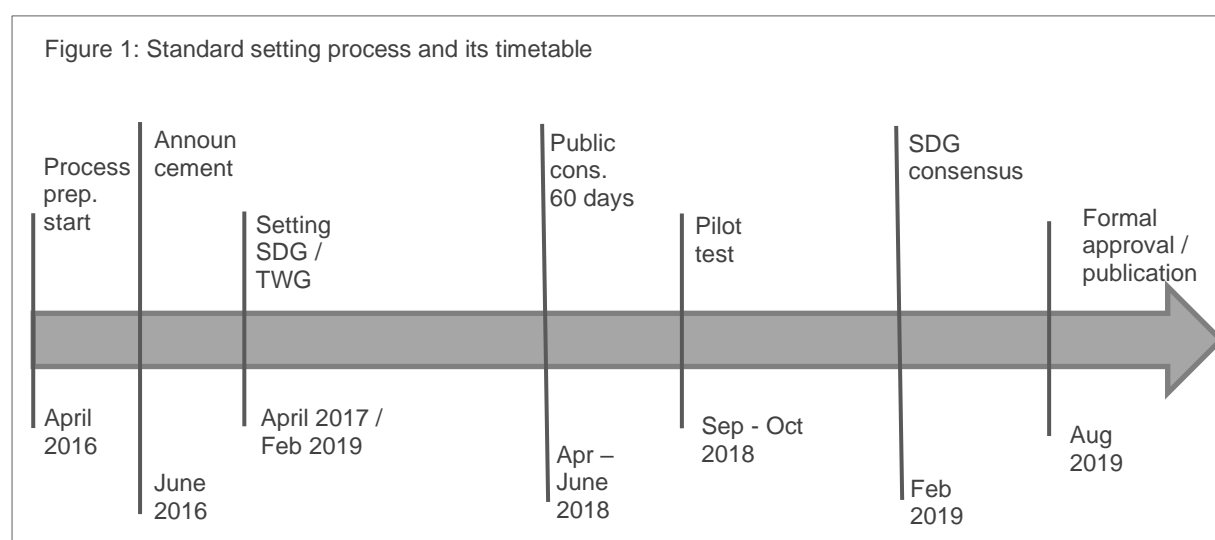
The scope of this assessment is focused on the standard setting activities carried out during the period between July 2016 (stakeholders mapping and contacting of stakeholders) and August 2019 (formal approval and publication of the ToF Standard).

Following PEFC ST 1001:2017, the assessment is only focused on the development of the ToF requirements (the ToF Standard). Development of other documentation and standards of the NCCF's scheme is outside the scope of this assessment.

Standard setting process

The standard setting process was formally started in April 2016, by its announcement at the NCCF's website and invitation of stakeholders to submit their nominations to the SDG. The process was completed by formal approval of the forest management standard (NCCF STD TOF 1/2019) on 10 August 2019. In addition, during the course of this assessment, the NCCF introduced several changes to the ToF Standard to address non-conformities identified in the draft interim report (NCCF STD TOF 2/2022).

The stages of the process and its timetable is shown in figure 1 (2016-2019):



Standard's proposal

Before the start of the process itself, the NCCF developed two documents outlining the development of a ToF Standard, its objectives, justification of a need, scope, expected outcomes, and the process stages and timetable:

- Concept note that outlines principal concepts in the development to the ToF standard as well as basic stages in the development of such a standard^[9];
- Project proposal for the development of the ToF standard^[10] with detailed description of the project, including its objectives and components (scope).

Neither of the documents describes the risk relating to the standardisation work or factors that could negatively influence the standard development and implementation. The compliance with the PEFC requirement was classified as "minor non-conformity – justifiable"

as the standard setting process started and this stage was executed (2016) before publication of this requirement (PEFC ST 1001:2017).

Stakeholders mapping

Before the formal announcement of the standard setting process, the NCCF identified a large number of relevant stakeholders, the stakeholder categories, key issues for stakeholder categories, key stakeholders and means of communication. The stakeholder mapping tables^[2,3] include stakeholders and their contact details organised in the following categories:

- Paper mills and others (14);
- Plywood industry and traders (16);
- Sawmills and traders (3);
- Handicraft and furniture industry (143);
- Government institutions (50);
- NGOs (104);
- Miscellaneous (200);
- Business associations (119);
- Multilateral funding agencies (70);
- Research institutes (125);
- PEFC stakeholders (14).

The stakeholders mapping table does not include “workers and trade unions” and “indigenous peoples” as a separate stakeholder category (as suggested by the UN Agenda 21). However, it identifies organisations such as BWI and ILO, as well as non-governmental organisations under other categories that focus on sustainable development and that are relevant to the issues of workers and indigenous peoples.

Some of the elements relevant to the stakeholders mapping are not included directly in the stakeholder mapping tables^[2,3] but in the Project Proposal document^[10] that describes in detail the current situation of the ToF management and relevant issues as well as stakeholder groups that are key drivers for the ToF management and for the standard setting. This implicitly defines the key issues that are relevant to different stakeholder groups. The Project Proposal document^[10] also defines the key communication tools and channels that are common for all stakeholder groups.

The stakeholder mapping tables^[2,3] include identification of “suggested members of SDG” that represents those stakeholders that are key to the standard setting process. The stakeholders mapping^[9,10] does not identify “disadvantaged stakeholders”. The NCCF response^[51] that “disadvantaged stakeholders were not identified” was not found sufficient to justify whether or not there can be ToF relevant stakeholders that would be disadvantaged from the participation in the ToF standard setting process, being on basis of available resources, language, social status, etc.

The conformity statements relating to the PEFC requirements on stakeholders mapping has taken into consideration the fact that the stakeholder mapping stage took place in 2016 before the latest edition of PEFC ST 1001 (2017) was published and the previous PEFC requirements (PEFC ST 1001:2010) where less explicit.

Announcement of the standard setting process

According to the Development report, the public announcement was made at the NCCF's website on 26 June 2016 and an “Expression of Interest” (Eoi)^[11] was emailed to identified stakeholders^[48].

NCCF claims that the announcement of the standard setting process and the establishment of the SDG were presented at the NCCF's website. However, the NCCF had changed its website during the process and its content in 2016 cannot be retrieved. The stakeholders online consultation and stakeholders interviews that was organised as a part of this evaluation confirm the presence of the website at the time of the start of the process and publication of the announcement there.

The public announcement was communicated to a large number of stakeholders by e-mail^[48] in July, August and October 2016. However, the email recipients do not cover all identified stakeholders but rather only those that were considered as key to the process. This part of the non-conformity can be considered as "justified" due to the fact that the PEFC requirement for email/letter communication of the announcement to all identified stakeholder was only introduced in PEFC ST 1001:2017 while the announcement of the TOF process took place in 2016.

All critical documents relevant to the announcement of the process, such as the project proposal, EoI, standard setting procedures are currently available at NCCF's website^[12] under a section dedicated to the ToF certification.

Working group for the development of ToF standard (SDG)

The development of the forest management standard was led by the SDG. The SDG included 48 members, including its Chairman. Members of the SDG were organised amongst the following 8 stakeholder groups: Industry and members (7), NGOs (7), Government authorities (2), State forest department (5), Research (6), Independent experts (8), Farmers (3), International stakeholders (7) (See also Annex D).

The group represents all three pillars of the sustainable management, economic, social and environmental. It represents economic interests of industry and businesses, as well as land owners/managers (state forest department, farmers); includes research organisations and independent experts as well as professional international organisations. Civil organisations (NGOs) are mainly represented by organisations that are working in the area of sustainable development. Most of the SDG members represent organisations that are operating on the whole territory of India; some of them (state forests departments, farmers, industry) are representing specific regions of India with the interest in ToF.

All members of the SDG have vast expertise and knowledge in their respective field. Significant proportion of the SDG membership is represented by scientific and research institutions and technical experts / consultants with experience in ToF management. The SDG also involved international stakeholders with knowledge and experiences from outside India.

The SDG has been established based on call for nominations that was distributed by e-mail/letter to stakeholders in June, August and October 2016. The NCCF accepted all received nominations but the SDG's composition was left open and the body was enlarged several times during the process by new stakeholders. The first meeting of the SDG was on 7 April 2017 followed by additional 3 meetings until 16 February 2019. The formal consensus was reached by a voting organised at the last SDG meeting.

The SDG established a TWG that consisted of some SDG members and that was responsible for preparation of draft standard and intensive debate on the standard content, addressing comments of other SDG members, comments received from external stakeholders during public consultation and the outreach project and incorporating results of the pilot tests. In between 2 July 2016 and 12 January 2019, the TWG met 17 times.

Open and transparent work of SDG

The SDG met 4 times in in-person meetings. The minutes of the meetings^[15-16] show that the SDG discussed all elements of the standard with general intention to achieve a consensus amongst stakeholders.

- The Forum met 4 times during the period April 2017 and February 2019.
- The meetings were well organised with clearly written and communicated agenda for each meeting, were recorded in the minutes of the meetings that were distributed to SDG members together with the latest versions of the ToF Standard^[15, 16, 21-22, 23-27].
- The meetings were well attended by members of the SDG. The SDG members were also provided with an opportunity to participate via videoconference.
- The SDG meetings provided sufficient time for discussion.
- The SDG meetings were supported by the analysis and drafting work of the TWG that met 17 times during the standard setting process.

The management of the SDG / TWG was exemplary and on very high professional level due to strong engagement of the SDG Chair and professionalism of the NCCF staff supporting the SDG's work. The meetings were announced in advanced and invitation were distributed by e-mail together with agenda, minutes of the previous meetings and other supporting documentation. The SDG members had access to draft documentation through the NCCF's website and were actively encouraged to make comments to the draft standard and its parts. The debate of the meetings was recorded in very detailed manner and members had access to the minutes of the meetings shortly after the meetings.

Public consultation

The NCCF organised public consultation on the ToF standard in the period starting from 25 April 2018 until 24 June 2018. The public consultation has been announced at the NCCF's website on 24 April 2018^[31].

The NCCF communicated the start of the public consultation by direct e-mails using a "chimplmail" application to 142 recipients. Also, direct emails were sent to the NCCF's stakeholders^[32, 52].

The public consultation was also supported by two regional workshops:

- a) Arid Forest Research Institute, Jodhpur, Rajasthan on 12 May 2018;
- b) Central Agroforestry Research Institute, Jhansi on 16 May 2018.

The comments from the public consultation (84) were considered by the TWG^[33,34,35, 53] and the SDG^[54]. The result of comments consideration was made publicly available by publishing a complete table with all comments and results of their consideration^[35,36].

The NCCF has not organised the second public consultation as required by PEFC ST 1001:2017. It should be noted that the NCCF has started planning the process before the publication of PEFC ST 1001:2017 that introduced the requirement for the second public consultation. However, the public consultation took place after PEFC ST 1001:2017 was published and NCCF should have reviewed its process accordingly. Although the NCCF has not conducted the second public consultation, it carried out additional direct consultations with government (Ministry of Agriculture and Farmer Welfare -MoA&FW) and stakeholders consultation as a part of pilot testing.

Pilot testing

The NCCF organised pilot testing in four different sites across India^[37,38-44] in September and October 2018.

In Rajasthan, the pilot testing was conducted in **Bikaner Forest Division** where plantations form a part of the long stretch along the Indira Gandhi Canal. The timber harvesting in this area has recently begun and is a source for raw material for the handicraft industries of Jodhpur, Jaipur and other parts of Rajasthan. Along with these plantations there are also nearby farmers who grow trees and supply wood to these industries.

The second pilot testing took place in the catchment areas of **Tamil Nadu Newsprint and Paper Limited (TNPL)** are the source of raw material for the organisation. The proposed piloting was conducted on the three different sites: covering (i) Farm Forestry; (ii) Captive Plantations and (iii) Group certification/cooperatives.

The third pilot testing took place in **Saharanpur, Uttar Pradesh**, the areas around **Star Paper Mills Ltd.** are the source of raw material for the mill. The organisation has developed its catchment in collaboration with farmers and has been working closely with them.

The fourth area is located close to **New Delhi**, the capital city of India where tree cover having substantial areas as avenue plantations, roadside plantations, and much more which are owned by Forest Department, Delhi Development Authority, Delhi Municipal Corporations, Horticulture Department etc.

An expression of interest (Eoi)^[37] for conducting the pilot testing was published at the NCCF's website in August 2018 inviting the potential stakeholders to participate in the process in capacity of observers and auditors^[37]. The NCCF selected experienced assessors with auditing experience to conduct the pilot testing.

The pilot testing resulted in detailed summary reports that were further supported by full Checklists^[38-44].

After the pilot testing, the TWG met in January 2019 to discuss and consider findings of the pilot testing. The TWG consideration was confirmed by the SDG meeting on 12 February 2019.

Approval of the standards by consensus (at the SDG level)

The SDG built consensus on the draft ToF standard at its fourth meeting^[16]. Further it was agreed that the SDG members would be given 2 weeks' time from the day of circulation of the revised NCCF-TOF Final Draft Certification Standard (v1.2) incorporating all the proposed changes^[28]. Comments and suggestions during these 2 weeks were recorded and incorporated appropriately in the standard^[29].

Taking into consideration the perspective of Ministry of Agriculture and Farmer Welfare (MoA) of India, the NCCF's Governing Body provided an extension for the consensus building to address the comments of the MoA and response from States. The extension was for a period of 6 weeks, including 4 weeks for offering comments and 2 weeks for review of comments and finalization of draft of the ToF Standard. Subsequently, MoA provided the NCCF with the comments from four agroforestry implementing states i.e. Karnataka, Odisha, Punjab and Uttar Pradesh. This took considerable time (April-July 2019). All the relevant suggestions and comments of MoA and of the States were incorporated and the revised draft version (v1.3) was subsequently circulated to SDG members^[30].

Neither the minutes of the SDG meeting^[16] nor other reviewed documentation indicates that any member of the SDG voted against the standard or raised sustained opposition against the standard.

Formal approval of the ToF standard and its publication

Final Draft Standard for Trees Outside Forest (ToF) Version (v1.3) NCCF-STD-TOF-1.3/2019 was submitted to members of the Governing Body on 06 August 2019 for their approval. The document was approved by the Governing Body on 10th August 2019, in the 16th Governing Body Meeting of NCCF^[45].

The ToF Standard as well as other NCCF's documentation was published at the NCCF's website^[46] (<http://www.nccf.in>).

The ToF Standard was then revised during the evaluation process and formally approved by the NCCF's Governing Board on 20 May 2022 and immediately published at the NCCF's website.

Resolution of complaints and disputes

The NCCF claims that it has received no complaint relating to the standard setting activities^[8]. The NCCF's claim was verified during stakeholders interviews conducted as a part of the in-country visit.

The NCCF's standard setting procedures as well as dispute settlement procedures identify contact point for submitting any complaint. Both the procedures as well as the contact point is available through the NCCF's website.

Results of the assessment of the standard setting process

The standard setting process complies with the PEFC requirements except the following minor non-conformities.

| PEFC requirement | 6.2.3: Identification of disadvantaged stakeholders |
|--------------------|---|
| Non-conformity No. | 1 |
| Type | Minor non-conformity |
| Description | <p>The NCCF carried out a stakeholder mapping in the beginning of the standard setting process and identified hundreds of stakeholders relevant to the ToF standard development organised in multiple stakeholder categories.</p> <p>However, the stakeholders mapping^[9,10] does not include identification of disadvantaged stakeholders (6.2.3).</p> <p>The NCCF response to the draft interim report^[51] that "disadvantaged stakeholders were not identified" was not found sufficient to justify whether or not there can be ToF relevant stakeholders that would be disadvantaged from the participation in the ToF standard setting process, being on basis of available resources, language, social status, etc.</p> |

| PEFC requirement | 6.3.1, 6.3.2: Public announcement of the start of the process |
|--------------------|---|
| Non-conformity No. | 2 |
| Type | Minor non-conformity |
| Description | <p>The Development report indicates that the public announcement was made at the NCCF's website on 26 June 2016 and that the an "Expression of Interest" (Eol)^[11] was emailed to identified stakeholders^[48]. The Eol includes an application for membership in the SDG and outlines basic rules of the SDG work. The Eol has been published at the NCCF's website^[12].</p> <p>The minor non-conformity has been assigned based on the following facts:</p> <ul style="list-style-type: none"> a) the public announcement referenced in the Development Report is not working due to migration of the original NCCF website and the original content and timing of the announcement cannot be retrieved. while the NCCF did not take a screenshot of that website (6.3.1a, c-f)). b) The email communication of the announcement^[48] describes the objectives of the standard setting process but does not reference the concept note^[9, 10] or the NCCF website with the concept note being available (6.3.1b). c) The email communication of the announcement^[48] describes the invitation to participate in the SDG. However, no other opportunities for stakeholders participation, e.g. public consultation are mentioned (6.3.1c). d) The email communication of the announcement^[48] does not include an explicit invitation and instruction on the how to submit feedback on the suggested standard setting process (6.3.1e). e) The email communication of the announcement^[48] describes the objectives of the standard setting process but does not reference the standard setting procedures or the NCCF website with the procedures being available(6.3.1f). |

| PEFC requirement | 6.4.2a: Balance representation in the SDG |
|--------------------|--|
| Non-conformity No. | 3 |
| Type | Minor non-conformity |
| Description | <p>The SDG includes a large number of stakeholders that are organized amongst 8 stakeholder groups. The group represents all three pillars of the sustainable management, economic, social and environmental. It represents economic interests of industry and businesses, as well as land owners/managers (state forest department, farmers); includes research organizations and independent experts as well as professional international organizations. Civil organizations (NGOs) are mainly represented by organizations that are working in the area of sustainable development. Most of the SDG members represent organizations that are operating on the whole territory of India; some of them (state forests departments, farmers, industry) are representing specific regions of India with the interest in ToF.</p> <p>However, the minor non-conformity has been assigned based on the fact that the composition of the SDG is missing interest of "workers and trade</p> |

| | |
|--|--|
| | <p>unions". No evidence has been submitted to demonstrate that the NCCF spent reasonable effort to include a stakeholder of this category in the SDG.</p> <p>On the other hand, it should be noted that the ToF standard and ToF management in India focuses on small holders (usually farmers) that do not usually employ other personnel. The interest of workers is also partially represented by the Export Council of Handicrafts that organises small producers of handicrafts.</p> |
|--|--|

| PEFC requirement | 6.5.2: Second public consultation |
|--------------------|---|
| Non-conformity No. | 4 |
| Type | Minor non-conformity |
| Description | <p>The NCCF has not organised the second public consultation.</p> <p>It should be noted that the NCCF has started planning the process before the publication of PEFC ST 1001:2017 that introduced the requirement of the second public consultation. However, the public consultation took place after PEFC ST 1001:2017 was published and should have reviewed its process accordingly.</p> <p>Although the NCCF has not conducted the second public consultation, it carried out additional direct consultation with government (Ministry of Agriculture and Farmer Welfare -MoA&FW) and stakeholders consultation as a part of pilot testing. Those processes significantly contributed to the final draft of the TOF standard.</p> |

| PEFC requirement | 7.2.2d: Specification of the "Review date" |
|--------------------|---|
| Non-conformity No. | 5 |
| Type | Minor non-conformity |
| Description | <p>The standard identifies the approval date and the review date. The review date is five years from the approval.</p> <p>However, the approval date of 20 May 2022 relates to the approval of changes related to the PEFC assessment process and non-conformities identified in the draft interim report. Although not explicitly specified by the PEFC documentation, the "review date" should follow the approval date of the initial edition of the standard (10 August 2019).</p> |

Observations to the standard setting process (not causing non-conformity with the PEFC requirements)

Stakeholders classification:

The NCCF is using slightly different classification of stakeholders (stakeholder category) in its standard setting procedures, stakeholder mapping exercise, concept note/project proposal and SDG composition. Although this difference is caused by the NCCF's effort to adapt the stakeholders' participation to TOF needs, the NCCF should, for better clarity, harmonise its approach in the classification of stakeholders.

8.2.3 Stakeholders questionnaire

TJConsulting distributed an invitation to an on-line survey to a vast number of Indian stakeholders (300+) with a request to provide feedback on the standard setting process of the ToF Standard.

TJConsulting provided stakeholders with an eight (8) weeks response period between 13 March and 20 May 2022. In total only 2 stakeholders participated in the survey. The results of the survey were taken into consideration in the scheme assessment. However, it should be noted that any interpretation of the survey results should take into consideration the limited number of received responses.

The questionnaire used in the survey is shown in Annex F to this report.

Outcomes of the stakeholders interview

- 2 participating stakeholders represented governmental organization and landowners/farmers;
- Both stakeholders noted the announcement of the standard setting process, one by the e-mail communication and the second by other communications means;
- One stakeholder noted the accessibility of the standard setting procedures in the announcement;
- Both stakeholders were invited to participate in the SDG by e-mail communication; one of them nominated himself to become a member of the SDG and the nomination has been accepted;
- One stakeholder noted public consultation and submitted his comments; those were considered and the stakeholder received feedback on those;
- None of the stakeholders submitted a complaint concerning the standard setting process;
- One stakeholder participated in the SDG and confirmed that the work of the SDG has been open and transparent and that the SDG reached consensus.

8.2.4 Stakeholders interviews

The assessment included online interviews with the stakeholders that were involved in the ToF revision process. In total, 18 stakeholders and additional NCCF personnel have been interviewed representing various stakeholder groups (forest owners / managers, forest industry, E-NGOs, consultants - experts, certification body, accreditation body, etc.).

The interviews mainly covered the ToF Standard development and key topics covered by the revision. The following notes represent feedback and views of the majority of the stakeholders interviewed.

Start of the process

- Stakeholders noticed the ToF development process, mainly through the e-mail distribution but also through direct communication with the NCCF staff or by working in the NCCF related bodies,
- Many key stakeholders were contacted directly by the NCCF staff to join the SDG.

SDG work

- SDG participation was well balanced with presence of all relevant stakeholders with high level of expertise;
- The SDG work was open and participatory with the intention of all members to reach consensus;
- The process was very well organized and structured, including meetings preparation, providing documentation in advance, keeping records, but also ensuring that the process delivers in time, etc.;
- The draft standards were discussed section by section, any disagreement was resolved by discussion; The SDG reached consensus;
- The ToF development timetable provided enough opportunity for participation, discussion and consensus building;
- There was a good collaborative atmosphere and willingness to listen to every comment and view, everybody had an opportunity to speak and his/her views were welcomed and respected.

Public consultation

- All comments were considered by the TWG and then by the SDG; outcomes were made publicly available,
- Positive feedback was received on the on-line public webinars; they provided significant opportunity for stakeholders to learn about the draft standards and provide feedback to the NCCF;
- Villagers, farmers, indigenous peoples were also consulted as a part of the pilot testing;

- The invitation to the public consultation was also communicated to members organizations (Export Council of Handicrafts, central and regional governmental bodies).

ToF pilot testing

- The ToF Standard was pilot at the four sites, in different regions by people with auditing and TOF experiences.

Main topics in the ToF development

The list below includes topics that were considered by the interviewed stakeholders as the key or most discussed during the standard setting process.

To make the ToF Standard suitable to small-scale farmers

Timber availability

Education of farmers

Chain of custody of certified products

Planting trees, source of planting material, invasive species

Productivity, proper management and silviculture

Biodiversity, natural ecosystems vs man-made biodiversity

Legal aspects

8.3 Requirements for group certification

8.3.1 Introduction

The NCCF scheme allows group certification as a certification model that is mainly suitable to the small forest ownership.

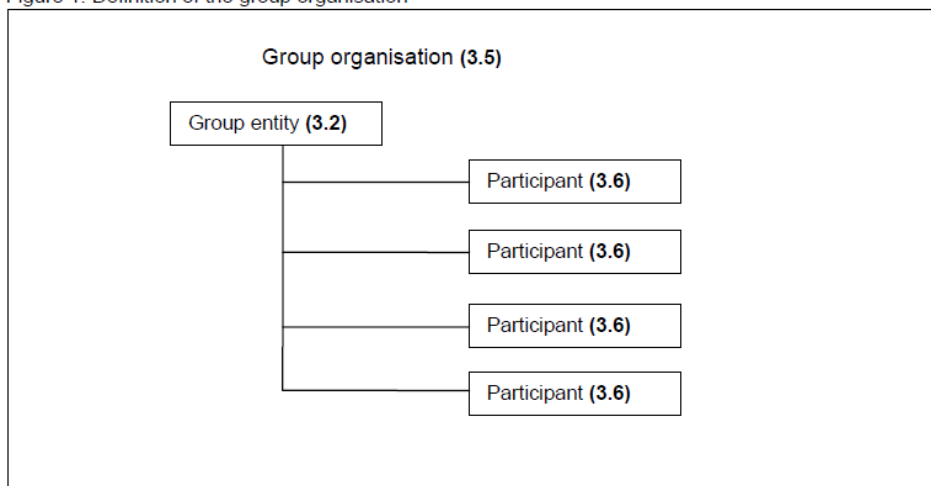
The requirements for the group certification are defined in NCCF STD GM TOF 2/2022 “*ToF Group Management Certification Standard*”.

The group certification model is based on a group of participants (land owners / managers) that is managed and controlled by a “group entity”.

8.3.2 Group certification model

The approach of the group certification is consistent with PEFC ST 1002:2018 as it describes requirements for the group entity and group participants.

Figure 1: Definition of the group organisation



The group certification standard includes the following chapters that define requirements for **Group Entity** and to **Participants**:

- Responsibilities and Functions of Group Entity
- Group Records
- Group Size
- Functions and responsibilities of participants
- Performance Evaluation
- Improvement
- Chain of Custody

The key requirements for the **group entity** contain:

- a) Representation of the group organisation;
- b) Commitment on behalf of the group entity;
- c) Appointment of the group representatives;
- d) Developing written procedures; defining key processes, planning and controlling those processes;

- e) Keeping records;
- f) Written agreement with group participants and management of admission of members;
- g) Providing participants with confirmation on their participation;
- h) Providing participants with guidance and information; internal;
- i) Identification of stakeholders and external communication;
- j) Operating an annual internal monitoring and internal audit programme;
- k) Review of the group's conformity, implementation of corrective and preventive measures;
- l) Chain of custody requirements.

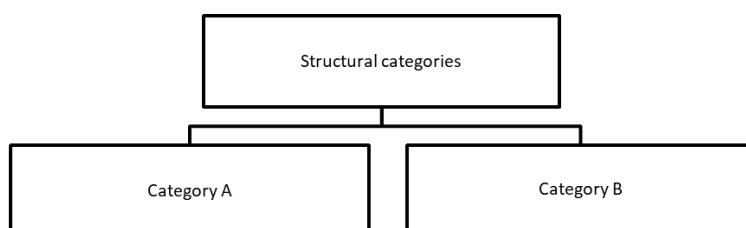
The requirements for **participants** contain:

- a) Written commitment to comply with certification requirements;
- b) Compliance with the ToF and other scheme requirements;
- c) Co-operation and assistance in the certification process;
- d) Implementation of corrective and preventive measures.

Internal audit programme

The document requires an internal audit programme that covers both, the group entity's performance and participants compliance with the ToF Standard and other requirements of the scheme.

The internal audit programme shall cover all participants in the group certification and is based on sampling of participants. The sampling is carried out separately for two distinct categories of publicly owned management units (Category A) and management units owned by farmers (Category B). 25 % of the participants shall be selected to the sample randomly and the rest by risk-based criteria



| Sample category | Size Class (ha)- (X) | Main evaluation | Surveillance | Re-evaluation |
|-----------------------------|-------------------------|--------------------------|--------------------------|--------------------------|
| Category A Management Units | >15,000 | $S = X$ | $S = 0.7 \cdot X$ | $S = 0.7 \cdot X$ |
| | 1,000-15,000 | $S = 0.4 \cdot X$ | $S = 0.2 \cdot X$ | $S = 0.3 \cdot X$ |
| Category B Management Units | 100-1,000 | $S = 0.8 \cdot \sqrt{X}$ | $S = 0.6 \cdot \sqrt{X}$ | $S = 0.6 \cdot \sqrt{X}$ |
| | Less than 100 | $S = 0.6 \cdot \sqrt{X}$ | $S = 0.3 \cdot \sqrt{X}$ | $S = 0.4 \cdot \sqrt{X}$ |

Results of the evaluation

The scheme's requirements for group certification (NCCF-STD- GM-ToF 02/2022) **comply** with all the PEFC requirements (PEFC ST 1002:2018).

Observations to the group certification requirements (not causing non-conformity with the PEFC requirements)

Reference to the regional certification

The definition of "group organisation" Note1 makes reference to the "region" and other terms chosen by the relevant certification scheme. This wording was taken from PEFC ST 1002:2018. However, its meaning in the context of the NCCF's scheme is confusing and misleading.

Definition of group organisation

The definition of "group organisation" Note1 makes reference to the "region" and other terms chosen by the relevant certification scheme. This wording was taken from PEFC ST 1002:2018. However, its meaning in the context of the NCCF's scheme is confusing and misleading.

Separate documents for SFM and ToF Group certification

The NCCF has developed and is managing two distinct documents / standards for group certification. NCCF-STD- GM-01/2017 for SFM group certification and NCCF-STD- GM-ToF 02/2022 for ToF group certification. It is expected that both certification modules are focused on small landholders and could be unified in a single document / Standard.

8.4 Trees outside Forests standard

8.4.1 Introduction and summary

Context of the ToF Standard

Trees outside forests (ToF) resource in India is playing a very important role in meeting the requirements of wood fibre of the country, especially the pulp and paper, plywood and composite products, handicrafts and furniture industry. Currently, ToF resource is estimated to meet more than 85% of the industrial wood requirements.

Historically, ToF in India have been planted along the roads, in parks and gardens, places of worships, in farms, in tea/ coffee estates. Such trees mainly grow on private or common lands and have remained an integral part of the cultural ethos and rural land use. ToF have contributed in meeting domestic needs and providing income to local people but has remained as invisible resource to land use agencies. The importance of ToF increased manifold in the last few decades, specially, after the launch of social forestry programmes in India since late 1970s. Now ToF has become the main source of industrial wood in the country. Trees outside the forests are also being recognized by policy-makers and planners an essential component of sustainable development and critical to food security. The Union Ministry of Agriculture has pronounced a National Agroforestry Policy in 2014 for the promotion of agroforestry in the India.

In India, “all trees growing outside the recorded forest areas” are defined as “Trees outside Forests”. The recorded forest area comprises of “reserve”, “protected” or “unclassified forests”. The trees growing in private lands in agroforestry, farm forestry, along the farm bunds and in homesteads, and in orchards and in common and government non-forest lands in parks and gardens, along roads, canals and railway line in rural or urban areas constitute ToF. For the purpose of understanding, ToF are classified in three categories, namely, block, linear and scattered forms.

In India, ToF constitutes the major source for production of industrial wood. Though reliable data on its annual production is not available, it has been estimated from the growing stock of ToF and also derived from estimated consumption of industrial wood in the country. Using the total growing stock of ToF estimated by Forest Survey of India (FSI) estimated the annual production of timber from ToF to be 74.5 million cubic meters.

Despite such a huge production from ToF resource, there is no sustainability system or certification standard for this resource at present. As a result, Indian manufacturers or producers using ToF raw material are unable to tap the global market and ToF value added products are not able to fetch desired price. Farmers who hold most of this resource and are already on the margin of the economy, get adversely affected.

Being in informal and private sector, there is a lack of uniformity in silvicultural, management and other operational practices. Further, there is a no mechanism to access to the improved and best management practices which are essential for sustainable management of this important resource. There are also problems with the marketing of the ToF product which is often unstable and inconsistent.

Based on management objectives and operations three broad situations exist in ToF namely the urban trees and forests (UTF), the agroforests in blocks, and the non-block agroforests comprising of linear plantations and/or scattered trees. Urban trees and forests (UTF) and linear plantations along highways /avenues as well as in parks and scattered trees gardens in urban areas have environmental and aesthetic purpose for abetting pollution, recreation, amenities and as green lungs and where mainly dead, dying and damaged trees are replaced. In case of block and compact agroforests, the main goal is economic return and are thus managed on economic considerations generally on short rotations. There are, of course tree groves in rural areas which have social and cultural values. The scattered trees in rural areas

which occur in homesteads and farms are also managed for economic returns with limited and no focus for environmental protection and biodiversity conservation except for the isolated trees planted in tea and coffee plantations which serve as shade trees.

Background on land ownership & tree planting by farmers in India

India is a densely populated country with agriculture as the largest source of livelihood. More than 65% people still depend on agriculture. The average operational landholding, per family (on an average one family = 5.5 persons) in India is little over 1 ha, where trees outside forests (ToF) can be grown. About 68.5% of the rural families in 2015-16 had only marginal landholdings (less than 1 ha) with an average of 0.38 ha. The percentage of small landholders (between 1 to 2 ha) was 17.5% with an average holding of 1.40 ha.

These 86% marginal and small landholders produce bulk of the timber in India from ToF grown mostly in scattered or linear formations on farm bunds etc. as reported in ToF inventory. Some marginal landowners may have only 5-10 trees. The objective of the marginal and small farmers for planting trees is to generate additional income which they like to maximise and or harvest /sale at the time of need. It would not be desirable to impose condition of sustainable harvest on an individual owner. But sustainability can be part of the group certification of the ToF standard while estimating annual allowable cut in management plan. These trees, however, contribute substantially to carbon sequestration and the carbon footprint of these landowners is low due to their lifestyle.

The semi-medium landholders (2 to 4 ha) constitute 9.5% with average holding of 2.7 ha and remaining about 4.5% constituted by medium (4 to 10ha) and large (more than 10ha) landholders. Some of these land holders grow ToF in blocks and also practice intercropping.

Scope of the ToF Standard

The standard is applicable for the certification of ToF - the trees growing in rural and urban landscapes in India. The definition and form of ToF in India is as follows:

- “All trees growing outside recorded forest areas” are defined as trees outside forests.
- Recorded forest area means “reserve”, “protected” or ‘unclassified forest’ as per the Indian Forest Act 1927 or under State Forest Acts
- Occurrence can be in the form of block, linear and isolated / scattered trees

The ownership of ToF resources is either private or community or government or with leased land status. The standard is also applicable to trees growing on community managed lands in the North-eastern states and elsewhere of the country. In addition, the standard is applicable to trees grown under Social Forestry, linear plantations along road, railway lines or canals irrespective of “Recorded Forest” status.

Standard is also applicable to the activities of all operators in the defined certified area, who have an impact on achieving compliance with the requirement. Operators shall refer to personnel’s responsible for certain operations such as harvesting and trading of standing trees etc. on certified land.

For the applicability, this standard has considered three broad categories of ToF formations,

- a. agroforests in block
- b. agroforests in non-block like linear, isolated, scattered and bund trees
- c. urban trees and forests (UTF) including trees in parks, in avenues etc.

| Formation | | Threshold | Classification as Intensive and Extensive ToF |
|-----------------------------------|------------------------|--|---|
| A. Block Agroforest | | | |
| 1 | Block | Area (min) = 0.1 ha *one edge longer than 10 m; (limiting factor is area) Area (max) = 25 ha (single block, individual ownership, as per Land Ceiling Act) After a single block is >25 ha area, NCCF-STD-FM-01/2017 shall be applicable | Agriculture intensive ToF |
| B. Non-Block Agroforest | | | |
| 2 | Linear | Single/Multiple row; Maximum width = 10 m (limiting factor is edge length) | Agriculture extensive ToF |
| 3 | Isolated and scattered | Single tree in farms, bunds, rural homesteads etc | |
| 4 | Bund | Trees around a farm boundary, tank bund, etc. | |
| C. Urban Trees and Forests | | | |
| 5 | Urban trees | Single/Multiple row; Maximum width = 10 m (limiting factor is edge length) | Settlement extensive ToF |
| 6 | Urban Forests | Area (min) = 0.1 ha *one edge longer than 10 m; (limiting factor is area) Area (max) = 25 ha (single block, individual ownership, as per Land Ceiling Act) | Settlement intensive ToF |

| Categories of classification | Extensive ToF | Intensive ToF |
|---|---|--|
| a) Size of management unit | Thresholds are defined in the above table | Thresholds are defined in the above table |
| b) Tree cover/ha | Less than 10% cover/ha | More than 10% cover/ha |
| c) Economic value of production | Annual cut: up to 10% of Standing Trees* | Annual cut: up to 20% of Standing trees |
| d) Intensity of management | Low Intensity silvicultural and management operations | High Intensity silvicultural and management operations |
| e) Scale of cultural, ecological and conservation value | Low degree of relevance at Individual level** | Higher degree of relevance |

*: Small and marginal landholding **farmers plant trees along with food crops mostly** in non-block form and shall be interested to harvest all trees /completely for additional income to meet some basic necessities and/or maximise the return from trees. The condition of 10% annual cut shall not be applicable in such cases to individual farmer.

: The number of trees with individual marginal and small farmers being **limited (isolated and scattered trees) they aren't available on scale to offer cultural, ecological and conservation value.

Structure of the Standard

Major issues relevant to ToF certification have been grouped together into similar **Themes**. The Themes are further elaborated by means of various **Criteria** for evaluation. Further, **Indicators** have been developed for each criterion, to enable judging the performance in the field.

| Criteria | | No. of ind. |
|--|------------------------------------|-------------|
| <p align="center">THEME A: LEGALITY COMPLIANCE WITH LEGAL REQUIREMENTS</p> <p>The theme deals with the legality aspect of the Trees outside Forests (ToF) in the Land Management Unit (LMU). There has to be compliance to national, state and local laws, regular payments of taxes, fee and other charges. The Trees Outside Forests Management (ToF) takes measures to protect and prevent illegal activities and has sufficient resources to carry out these activities. The ownership of lands along with rights are clearly documented.</p> | | |
| 1.1 | Compliance with legislation | 6 |
| 1.2 | Protection from illegal activities | 2 |
| 1.3 | Ownership, use and tenure rights | 5 |

| Criteria | | No. of ind. |
|--|---|-------------|
| <p align="center">THEME B: MANAGEMENT PLAN AND PRACTICES</p> <p>The theme deals with the development and management of the ToF resource in the LMU in an organised manner through a management plan. Management plan includes practices for the sustainable management of the trees outside forests, demarcation of boundaries, defining the roles and responsibilities, periodic monitoring & evaluation, inventurisation and encompassing the social, economic and ecological dimensions.</p> | | |
| 2.1 | Management plan | 6 |
| 2.2 | Sustainable production | 3 |
| 2.3 | Mapping of ToF resources | 3 |
| 2.4 | Periodical update of management plan | 3 |
| 2.5 | Roles and responsibilities in the management | 3 |
| 2.6 | Periodic inventory, monitoring and evaluation | 5 |
| 2.7 | Monitoring of production and timber tracking | 5 |
| 2.8 | Analysis of monitoring results | 4 |
| 2.9 | Complaints and dispute resolution | 1 |
| 2.10 | Documented information | 2 |

| | | |
|------|--|---|
| 2.11 | Performance evaluation and improvement | 1 |
| 2.12 | Management review | 3 |
| 2.13 | Nonconformities and corrective actions | 3 |
| 2.14 | Continual improvement | 1 |

| Criteria | | No. of ind. |
|---|--|-------------|
| <p style="text-align: center;">THEME C: MAINTENANCE OF HEALTH OF ToF RESOURCES</p> <p>The theme deals with the maintenance of health of ToF resources. The ToF resources are continuously monitored against suitable parameters. Selection of species should be based on site specifications, economic value, aesthetic value, environmental and societal suitability, etc. Application of pesticides and fertilizers should be minimal.</p> | | |
| 3.1 | Maintenance and improvement of health and vitality | 6 |
| 3.2 | Planting by suitable species | 4 |
| 3.3 | Use of pesticides | 6 |
| 3.4 | Use of fertilisers | 4 |
| 3.5 | Disposal of waste and minimisation of risk of environmental harm | 3 |
| 3.6 | Monitoring of ToF resource health and vitality | 3 |

| Criteria | | No. of ind. |
|---|--|-------------|
| <p style="text-align: center;">THEME D: MAINTENANCE AND ENHANCEMENT OF PRODUCTIVE FUNCTIONS</p> <p>The theme deals with the diverse and complete utilization of ToF resource, the establishment and development of a robust local economy, monitoring of operations including tending, harvesting and transport and an emphasis on the use of goods and services. The theme also considers traditional management systems and their integration into the management. The theme also covers emerging aspects of market valuation and trading mechanisms like CDM, REDD+, emerging and new carbon markets.</p> | | |
| 4.1 | Sustainable production | 4 |
| 4.2 | Sound economic performance | 4 |
| 4.3 | Monitoring of harvesting operation | 5 |
| 4.4 | Minimisation of impacts of tending, harvesting and transport | 4 |

| Criteria | | No. of ind. |
|---|--------------------------------------|-------------|
| <p style="text-align: center;">THEME E: SOCIO-ECONOMIC RESPONSIBILITY</p> <p>The theme deals with matters pertaining to welfare of workers, staff, local people etc. It includes provisions for a safe working environment, policies and guidelines in context to the national, state and local laws and regulations; health and safety of workplace, workshops, trainings, accessibility to good management practices and knowledge sharing activities. Other issues addressed by the theme includes no discrimination among workers based on caste, religion, sex, age, bar on employment of children below 14 years of age etc. whether permanent, temporary or contract workers.</p> | | |
| 5.1 | Multiple functions of agroforestry | 5 |
| 5.2 | Payment of wages, working conditions | 5 |
| 5.3 | Safe working environment | 5 |
| 5.4 | Knowledge sharing | 2 |

| Criteria | | No. of ind. |
|---|---|-------------|
| <p style="text-align: center;">THEME F: CONSERVATION AND ENVIRONMENTAL SAFEGUARDS</p> <p>The theme deals on protection and conservation of sites having historical, cultural, spiritual and ecological values. The theme also looks at maintenance and conservation of soil and water resources within the LMU, discourages use of invasive species and prohibits use of Genetically Modified Plant species.</p> | | |
| 6.1 | Sites with recognised historical, cultural, spiritual and ecological significance | 6 |
| 6.2 | Soil degradation and water quality | 4 |
| 6.3 | Invasive species | 2 |
| 6.4 | GMO | 2 |

8.4.2 Assessment of the ToF standard

8.4.2.1 Description of the Standards' compliance with PEFC ST 1003:2018

General requirements (PEFC ST 1003:2018, 4.1, 4.3.1, 4.3.2)

The standard includes clear and auditable requirements for Land Management Unit level, both management system (planning, monitoring, etc.) as well as performance-based requirements (Criteria) with specific Indicators for ToF operations. The Standard also allows the requirements to be implemented and verified at the group level in case of group certification. The standard defines that it applies to all entities operating on defined area (Scope). It requires records keeping as a part of individual Indicators.

The Standard requires to identify boundaries and scope of the management system and refers to the continuous improvement cycle (4.3).

Usage of PEFC claims (PEFC ST 1003:2018, 4.1)

The standard states that forest owner/manager with PEFC-recognised certificate issued against the Standard shall use the PEFC claim "100% PEFC certified" only for products originating in the certified area (2.7.3).

The Standard requires to provide customers with information that is satisfying PEFC ST 2002:2020 (2.7.3).

Stakeholders' identification (PEFC ST 1003:2018, 4.2)

The Standard requires to identify affected stakeholders, their needs and expectations (Scope).

Leadership / commitment (PEFC ST 1003:2018, 5)

The Standard requires publicly available commitment on compliance with the Standard and identification of responsibilities (2.1.4).

Planning (PEFC ST 1003:2018, 6)

The Standard describes risks and opportunities relating to the management of ToF; considers different types of ToFs and different modules of the implementation taking into account size and scale of the ToF operations ((Scope)); requires to conduct inventory and mapping of ToF resources (2.1, 2.1.6), defines requirements for periodically updated management plan (2.1, 2.2, 2.4, 2.7, 4.1.4) and its public availability (2.1.3).

Legal compliance (PEFC ST 1003:2018, 6.3.1), **legal customary and traditional rights** (6.3.2), **human rights** (6.3.2.3), **fundamental ILO conventions** (6.3.3), **indigenous peoples rights** (6.3.2.2)

The Standard requires compliance with **applicable legislation** and defines areas of the applicable legislation that satisfies the PEFC requirements (1.1.1, 1.1.2, 1.1.6). The Standard requires protection of forests from illegal activities of third parties, providing resources for those activities, remedial actions and records keeping (1.2).

India has **anticorruption legislation** in place and the Standard requires compliance with the anti-corruption legislation (1.1.2). The Standard requires that management shall respect the **Universal Declaration on Human Rights** (1.1.4).

The Standard includes a requirement for **tenure, land leasing or use rights, including customary and traditional rights**. The Standard also defines requirements for dispute resolution over the land rights (1.3.1-1.3.4).

The Standard does not include an explicit requirement for **indigenous peoples**. India has not ratified the ILO Convention 169¹³ and voted in favour of the UN Declaration on the Rights of Indigenous Peoples, 2007¹⁴. The omission of specific requirements relating to indigenous peoples (scheduled tribes) in India is largely justified and the issue of indigenous peoples have only limited effect on the management of ToF (See description of the relevant non-conformity).

India has ratified 6 out of 8 **fundamental ILO Conventions**. This opens a risk of whether or not the non-ratified Conventions (C087, C098) have been implemented into Indian legislation. The Standard explicitly requires compliance with all 8 fundamental ILO Conventions, including those that have not been ratified (5.3.4).

Health, safety and working conditions (PEFC ST 1003:2018, 6.3.4)

The Standard requires **safe working environment** that do not endanger workers' health; identification of the risks and workers being informed about them; and preventive measures to mitigate the risks (5.3.1 – 5.3.5).

The Standard requires the **legal wage schedule** to be applied to all workers regardless of their origin (5.2). The Standard also includes requirements prohibiting any type of **discrimination** (sex, caste, religion, gender, region, race, etc.), (5.2.2); requires equal wage for equal work (5.2.3) and communication of wage, working hours, salaries and other benefits to workers (5.2.5).

Resources, competence, communication, dispute settlement, documented information (PEFC ST 1003:2018, 7)

The Standard requires **availability of resources** needed for planning, implementing, maintenance and continual improvement of actions required by the standard (2.1.5).

The Standard requires all employees of the owner/manager to attend training (2.5.3, 5.4.1) and the owner/manager is also required to provide **training** on new procedures as an outcome of a monitoring programme (2.8.4).

The Standard includes provisions for handling **complaints** and disputes relating to the land, tenure and use rights (1.3.2) and other management issues (2.9.1).

The Standard includes requirements for **documented information** and its management (2.10). In addition, specify documentation or records that shall be kept or made available to demonstrate compliance with the Standard.

¹³ https://www.ilo.org/dyn/normlex/en/f?p=1000:11200:0::NO:11200:P11200_COUNTRY_ID:102691

¹⁴ <https://www.un.org/development/desa/indigenouspeoples/declaration-on-the-rights-of-indigenous-peoples.html>

Maintenance and enhancement of ToF resources (PEFC ST 1003:2018, 8.1)

The Standard requires as a part of the management planning to **maintain or increase quantity of growing stock** without harming other functions of the ToF (2.2) and monitoring of growths and yield (2.7.1). The Standard also includes requirements to protect other social and environmental functions of the ToF (5, 6).

The Standard includes specific requirements increase of **carbon sequestration** and emissions reduction (2.6.4) support to **climate positive activities** (2.6.5).

Forest conversion (PEFC ST 1003:2018, 8.1.4, 8.1.6)

The Standard requires compliance with legislation, including forest conversion (1.1.1) and prohibits forest conversion to ToF plantations unless in justified circumstances (1.3.5). Those circumstances are identical to the PEFC requirement 8.1.4. The ToF plantation that does not meet the requirement is not eligible for the certification (1.3.5).

Afforestation of ecologically important non-forest ecosystems (PEFC ST 1003:2018, 8.1.5)

The Standard prohibits conversion ecologically important non-forest ecosystems to ToF plantations unless in justified circumstances (1.3.5). Those circumstances are identical to the PEFC requirement 8.1.5. The ToF plantation that does not meet the requirement is not eligible for the certification (1.3.5).

Maintenance of health and vitality (PEFC ST 1003:2018, 8.2.)

The Standard includes requirements relating to the ToF's health and vitality (3.1); requires measures to strengthen natural processes (3.1.1); minimisation of degradation risk (3.1.2), rehabilitation of degraded lands (3.1.3) and successful regeneration (8.1.4).

The Standard requires genetic tree species composition that is adapted to the site (3.2), mixture of tree species, agriculture crops and animals (5.1) and requires monitoring of fauna and flora structure and composition in the management unit (2.7.1), and requires minimisation of damages to environment (4.4); soil and water resources (6.2).

The Standard requires makes limitation to the use of fire as the management technique and requires proper management and control (3.1.5).

Waste management (PEFC ST 1003:2018, 8.2.5)

The Standard includes requirements for disposal of waste, spillage of oil or fuel and minimisation of risk of environmental harm (3.5).

Integrated pest management (PEFC ST 1003:2018, 8.2.6), **usage of pesticides** (8.2.7), and **fertilisers** (8.2.5)

The Standard includes requirements for minimisation of the pesticides usage (3.3), requires an integrated pest management (3.3.6), usage of natural mechanisms (3.1.1) and regulates use of biological control agents (6.4.2).

The Standard includes prohibition of the use of **pesticides** of WHO 1A and 1B class with an exemption clause (3.3.1). The Standard prohibits the use of chlorinated hydrocarbons, pesticides banned by Stockholm agreement (3.3) and other substances banned by national legislation (3.3.2).

The standard requires that the use of pesticides shall follow manufacturer's instructions with proper equipment and training (3.3.4).

The Standard requires controlled use of **fertilisers** (3.4), requires soil testing and site-specific nutrient management (3.4.1), minimisation of fertilisers and preference to organic and bio-fertilisers (3.4.2), SOP for the fertilisers use (3.4.3) and records keeping (3.4.4).

Production function (PEFC ST 1003:2018, 8.3.1, 8.3.2) and **sound economic performance** (8.3.2)

The Standard includes requirements to maintain production capability of ToF (4.1, 4.3, 4.4). The Standard includes requirements that operation shall not reduce the productive capacity (4.4, 4.4.1) and shall not damage soil (6.2.1), water (6.2.1) and remaining vegetation (4.4.1, 4.4.2, 4.4.3).

The Standard includes requirements for sound economic performance (4.2), diversification of production (4.2.1), usage of market studies (4.2.2.), exploration of new markets (4.2.3) and opportunities of programs such as CDM, REDD+ and other "Carbon markets" (4.2.4).

Sustainable production (PEFC ST 1003:2018, 8.3.4)

The Standard includes requirements that operation shall not reduce the productive capacity (4.4, 4.4.1).

The Standard requires a long-term sustainability of wood and non-wood products harvesting that shall not exceed a rate that can be sustained at the long term (4.3).

Forest infrastructure (PEFC ST 1003:2018, 8.3.5, 8.4.11, 8.5.5)

The Standard includes requirements for building infrastructure and its maintenance with minimisation of impacts on the soil and water and environment (6.2.3).

Maintenance of biological diversity (PEFC ST 1003:2018, 8.4.1, 8.4.2, 8.4.8, 8.4.9, 8.4.10, 8.4.12), **protected species** (8.4.3)

The Standard includes general requirement for maintenance of biodiversity by improving ecological connectivity (3.1.3), maintenance and enhancement of biodiversity at the species, ecosystem, landscape and genetic level (3.1.6); protection of sites of ecological importance (6.1.1 and 6.1.2) and protection of rare, endangered and threatened species (6.1.3).

The Standard includes a general requirement for identification and protection of "sites with ecological importance" that includes protected, rare or sensitive ecosystems including riparian habitats and wetlands (6.1.1), requires protection of rare, threatened and endangered species and their habitats and improvement of biodiversity at the genetic level (3.1.6).

The Standard includes requirements for usage of traditional knowledge (4.1.2) and support of traditional management systems (6.1.4).

The Standard includes requirements for minimisation of and avoidance of damage by tending, harvesting and transportation to ecosystems (4.4) and requires activity improving biodiversity (3.1.6).

The Standard requires mixture (balance) of trees, agriculture crops and animals (8.4.12), including control of damages by domesticated and wild animals.

Regeneration (PEFC ST 1003:2018, 8.4.4, 8.4.6), **local and introduced species** (8.4.5), **GMOs** (8.4.7)

The Standard requires successful regeneration by natural regeneration or planting.

The Standard requires to use species suitable to site conditions, including edaphic conditions, water conservation, and the adjoining crops (3.2.1), native and well adapted species (3.2.2), and prohibits use of invasive and disease carrying tree species (3.2.3).

The standard also requires usage of only those introduced species whose impact on the ecosystem has been evaluated (3.2.2).

The Standard includes a requirement for improvement of ecological connectivity by planting (3.1.3).

The Standard requires prohibition of the GMO material (6.4.1).

Dead wood, special feature of biodiversity (PEFC ST 1003:2018, 8.4.13)

The Standard requires leaving fallen dead wood, hollow trees, old growths and rare tree species (6.1.5).

The Standard requires protection of rare species (2.1.2 and 6.1.3) and requires activities promoting biological diversity (3.16).

Soil protection function (PEFC ST 1003:2018, 8.5.1, 8.5.2, 8.5.3)

The Standard ensures protective functions of ToF through maintaining health and vitality of ToF resources (3.1.1, 3.1.2) and through protection of soil and water resources from negative impacts of ToF management (6.2).

The Standard requires identification (6.1.1) and protection of sites of ecological importance (like protected, rare or sensitive ecosystems including riparian habitats and wetlands) and sites that fulfil protective functions.

The Standard includes requirements to avoid soil degradation, soil erosion and negative impacts on water resources (6.1.1, 6.1.2, 6.2).

Water protection function (PEFC ST 1003:2018, 8.5.1, 8.5.4)

The Standard includes requirements for identification of sensitive ecosystems, that also include riparian areas and wetlands (6.1.1, 6.1.2). The Standard also includes general requirement protection water resources from soil erosion (6.2.1), prohibits to use harmful chemicals around water sources and practices with negative impacts on water quality and quantity (6.2.4).

Socio-economic functions (PEFC ST 1003:2018, 8.6.1, 8.6.2, 8.6.3, 8.6.5)

The Standard requires that social well-being is not negatively affected (2.2.3), includes requirements for socio-economic functions (5.1, recreation, aesthetic, pollution control, opportunities for employment); and identification and protection of sites with historical, cultural and spiritual significance (6.1.1, 6.1.2).

The public access is required for UTF (5.1.3) that is usually owned by communities. The public (communities) land, both ToF as well as forests provides sufficient opportunities for public recreation.

The Standard requires protection of sites with historical, spiritual and cultural significance and sites fundamental meeting the needs of local communities (6.1.5). The indigenous people (respectively scheduled tribes) are considered as a part of local communities.

The Standard includes requirements for usage of traditional knowledge (4.1.2) and support of traditional management systems, including equitable sharing of benefits of such knowledge (6.1.4).

The standard includes a requirement for important of ToF management in local economy and local employment (5.1).

Research (PEFC ST 1003:2018, 8.6.7)

The Standard requires contribution to research activities and data collection (2.1.3).

Monitoring (PEFC ST 1003:2018, 9.1)

The Standard includes requirement for monitoring of forest resources, including all elements of the management plan, wood and non-wood products utilisation (2.7). Results of the monitoring are analysed and considered in management planning (2.8).

The Standard includes requirement for monitoring of ToF resources that also covers their health (2.7). Specific requirements for periodic health monitoring cover pests, diseases, land degradation, overgrazing, overstocking, risks of fire health (3.6).

The Standard includes a requirement for monitoring of work conditions (5.3.5).

Internal audits (PEFC ST 1003:2018, 9.2), **management review** (9.3) and **improvement** (10)

The Standard requires an internal audit of the management system and compliance with the ToF standard, and their effective implementation (2.11) that are identical with the PEFC requirements.

The Standard includes requirements for management review (2.12), management of non-conformities (2.13) and for continuous improvement (2.14.1) that are identical with the PEFC requirements.

Good agriculture practices (PEFC ST 1003:2018, App 2/C)

The Standard requires the management plan to follow Good Agriculture Practices – GAP (2.1.1). Specific reference to the GAP is also made for usage of fertilizers (3.4.3).

Exempted PEFC requirements (PEFC ST 1003:2018, App 2/D)

The Standard defines three types of ToF:

- Block agroforest (BA);
- Non-block agroforest (NBA); and
- Urban tree formation (UTF).

The chapter Scope defines criteria for extensive and intensive ToF.

The Standard does not apply exemptions allowed by PEFC ST 1003:2018. Instead, it allows the requirements to be applied at the group level in case of group certification.

Categorisation of ToF (PEFC ST 1003:2018, App 2/E)

The Standard defines three principal categories of ToF (BA, NBA and UTF) while BA are considered as intensive, NBA as extensive considered as “extensive”. For UTF, the Standard distinguishes urban trees as extensive while urban forests as extensive.

The following criteria are used to distinguish between the categories and their extensive/intensive nature:

- a) Size of a management unit (or block);
- b) Tree cover per hectare
- c) Economic value of production,
- d) Intensity of management,
- e) Scale of social or environmental importance,
- f) Structure of ToF (block, linear, individual/scattered, bund);
- g) Presence in an urban area.

8.4.2.2 Results of the assessment and non-conformities

The Standard complies with the PEFC requirements described in PEFC ST 1003:2018, except the following non-conformity.

| PEFC requirement | 6.3.2.2: Indigenous people |
|--------------------|---|
| Non-conformity No. | 6 |
| Type | Minor non-conformity |
| Description | <p>The Standard includes a requirement for tenure, land leasing or use rights. The Standard also defines requirements for dispute resolution over the land rights. This would also implicitly cover rights of indigenous people.</p> <p>However, the Standard does not include an explicit requirement for indigenous peoples. A note to the requirement 1.3 states that the issue indigenous people in India is only relevant to the management of forests with the reference to the Forest Rights Act (FRA) 2006.</p> <p>India has not ratified the ILO Convention 169¹⁵ and voted in favour of the UN Declaration on the Rights of Indigenous Peoples, 2007¹⁶.</p> <p>India is not using the term “indigenous people”. Instead, the Indian Constitution calls the aboriginal tribal groups “Scheduled Tribes” (also known as the “Adivasi”). It is reported that the Schedule Tribes represent 8.6 % of the Indian population¹⁷. More than half of the tribal population resides in six states of Northeast India.: Madhya Pradesh, Chhattisgarh, Maharashtra, Orissa, Jharkhand and Gujarat. The Northeast of India has a particularly heavy tribal element. These ancient aboriginal peoples tend to live in isolated communities in hills and forestlands, far from urban centres¹⁸. The scheduled tribes living in the Northeast greatly depend on land and forest for</p> |

¹⁵ https://www.ilo.org/dyn/normlex/en/f?p=1000:11200:0::NO:11200:P11200_COUNTRY_ID:102691

¹⁶ <https://www.un.org/development/desa/indigenouspeoples/declaration-on-the-rights-of-indigenous-peoples.html>

¹⁷ <https://www.un.org/development/desa/indigenouspeoples/declaration-on-the-rights-of-indigenous-peoples.html>

¹⁸ [Indigenous Peoples of India – Indigenous Peoples Literature \(wordpress.com\)](#)

their livelihood through agriculture particularly shifting cultivation, food gathering and hunting¹⁹.

The omission of specific requirements relating to indigenous peoples (scheduled tribes) in India is **largely justified** and the issue of indigenous peoples have only **limited effect on the management** of ToF, taking into account the following facts:

- a) Most of the scheduled tribes are forest dependent communities, using forest resources for their livelihood; Their rights within the forest boundaries are well regulated and protected by legislation, Forest Rights Act (FRA) 2006. The issue is outside the scope of the ToF management;
- b) ToF management within the Indian context is mainly focused on small holders which are not affected by the scheduled tribes' rights;
- c) Scheduled Tribes rights are subject to governmental regulations²⁰ activities and concerns. It has created a special Ministry of Tribal Affairs²¹ and National Commission for Scheduled Tribes²².
- d) Issues relating to customary rights or disputes over the land use and tenure rights relating to the scheduled tribes can be resolved by the Criterion 1.3 of the Standard.

¹⁹

https://www.academia.edu/75283445/Land_Agriculture_and_Livelihood_of_Scheduled_Tribes_in_North_East_India

²⁰ THE SCHEDULED CASTES AND THE SCHEDULED TRIBES (PREVENTION OF ATROCITIES) ACT, 1989

²¹ [Ministry of Tribal Affairs - Government of India](#)

²² [National Commission for Scheduled Tribes | Government of India \(ncst.nic.in\)](#)

8.5 Chain of custody requirements

The applicant has not submitted for the assessment and PEFC endorsement its own scheme specific chain of custody standard and its own, scheme specific requirements for chain of custody certification bodies. The PEFC endorsement application included the PEFC Council's international standards PEFC ST 2002 and PEFC ST 2003.

The assessment of the CoC requirements has been made as a part of the 2018/2019 endorsement. Therefore, this evaluation will only verify whether the submitted revised scheme documentation continues in making mandatory references to the PEFC international chain of custody standard (PEFC ST 2002) as the standard to be used for the chain of custody certification.

- PEFC ST 2002 is referenced in the notification procedures (NCCF STD NCB TOF 1/2019). It requires (chapter 5.2) the certification body to only use PEFC ST 2002 as the applicable standard for chain of custody certification in India. The conditions of the notification of certification bodies as well as the specimen contract between the NCCF and the notified certification body (an Annex to NCCF STD NCB 1/2019) are mandatory, are enforceable, and have been approved by the NCCF Governing Body.

Conclusion

The NCCF adopted the PEFC international standard for chain of custody (PEFC ST 2002, undated reference) indirectly through mandatory references in the notification procedures and in the notification contract (NCCF STD NCB TOF 1/2019). As NCCF is making undated reference to PEFC ST 2002, following the ISO rules for referencing normative documents, this applies to the latest version of the document, i.e. PEFC ST 2002:2020.

The scheme satisfies the PEFC requirements for chain of custody.

8.6 Requirements for certification bodies

8.6.1 Requirements for chain of custody certification bodies

The applicant's scheme has adopted the PEFC international chain of custody standard for the purposes of chain of custody certification (See chapter 8.5).

Therefore, the applicant is expected to also formally adopt the PEFC international requirements for chain of custody certification bodies (PEFC ST 2003:2020) without any modifications. The applicant is not allowed to develop any scheme specific requirements for chain of custody certification bodies.

The assessment of the requirements for CoC certification bodies has been made as a part of the 2018/2019 endorsement. Therefore, this evaluation has only verified whether the submitted revised scheme documentation continues in making mandatory references to the PEFC international requirements for chain of custody certification bodies (PEFC ST 2003:2020).

Formal adoption of PEFC ST 2003

- PEFC ST 2003 is required in the notification procedures (NCCF STD NCB TOF 1/2019) and a notification contract that is a mandatory part of the NCCF STD NCB TOF 1/2019. It requires the certification body to comply with PEFC ST 2003:2013 as the only applicable standard for chain of custody certification bodies in India and to have PEFC ST 2003:2013 included in the scope of their accreditation. The conditions of the notification of certification bodies as well as the specimen contract between the NCCF and the notified certification body (an Annex to NCCF STD NCB TOF 1/2019) are mandatory, are enforceable, and have been approved by the NCCF Governing Body.

| PEFC requirement | Reference to PEFC ST 2003:2020 |
|--------------------|---|
| Non-conformity No. | 7 |
| Type | Minor non-conformity |
| Description | <p>Annex to NCCF STD NCB TOF 1/2019 makes dated reference to PEFC ST 2003:2013 that was revised and replaced by PEFC ST 2003:2020. The NCCF document has been adopted in 2019 before the publication of the latest edition of the PEFC International Standard and as such includes reference to the edition valid at that time.</p> <p>As the NCCF document uses "dated reference", the NCCF should revise NCCF STD NCB TOF 1/2019 and make reference to the latest edition of PEFC ST 2003 (2020) or to use "undated reference" with listing of the document under normative references and clear explication of the application if "undated normative reference" (See for example ISO standards).</p> <p>On the other hand, it should be noted that PEFC ST 2003:2020 includes a clear and explicit statement that the document replaces the previous version PEFC ST 2003:2013. As such, regardless of wording of NCCF STD NCB TOF 1/2019, the certification and accreditation bodies are not allowed to use PEFC ST 2003:2013 after its replacement of the new edition, respectively after given transition period.</p> |

8.6.2 Requirements for forest management certification bodies

The assessment of the requirements for certification bodies was made as a part of the 2018/2019 endorsement. It is expected that the NCCF's requirements for certification bodies (NCCF -STD- ACR-ToF 01 /2019) have only been amended to incorporate the new certification model. Therefore, the assessment will focus on whether the revised scheme documentation and its changes (NCCF-STD-ACR-ToF 01/2019) continue complying with the PEFC requirements and the ToF standard is properly referenced as "certification requirements" for the ToF certification.

The NCCF has made some modification to NCCF-STD-ACR-ToF 01/2019 compared to the previous edition of the document (NCCF-STD-ACR-01/2017):

| Chapter | Description of the amendment / modification | Impact on PEFC conformity |
|---------|---|--|
| | Chapter Terms and definitions has been moved to an Annex | No impact |
| | Small editorial changes in style of clauses / notes, etc | No impact |
| 5.2 | Impartiality requirements have been modified to reduce redundancy with ISO/IEC 17065. The document continues requiring full compliance with ISO/IEC 17065 | No Impact |
| 9.1 | Process requirements: Stage 1 and Stage 2 approach has been changed and its content has been integrated in an evaluation process. | No impact |
| 10 | Risk assessment tool The document developed a certification module based on a risk assessment that is defined in a separate document (NCCF-GD-RAT-ToF 01/2021) | The change has significant impact on compliance with the PEFC requirements. Evaluated separately. |
| Annex 2 | Accreditation Reference to FM Standard has been extended to other NCCF Standards (to also cover ToF certification) | No impact |

Evaluation of the Risk Assessment Tool (RAT)

The RAT is referenced in the NCCF's document for certification bodies (NCCF-STD-ACR-ToF 01/2019).

NCCF –STD-ACR-ToF 01/2019

"10 Risk Assessment Tool

Risk Assessment Tool shall be used for certification as per Guide to Auditing and Certification Procedure using Risk Assessment Tool under NCCF ToF Certification Scheme (NCCF-GD-RAT-ToF 01/2021)".

The RAT is then described in an alone standing NCCF document (NCCF-GD-RAT-ToF 01/2021, "Guide to Auditing and Certification Procedure using Risk Assessment Tool under NCCF ToF Certification Scheme").

It should be noted that following the in-country visit, the NCCF decided^[51] to take the RAT out of the scheme and the respective section in the ToF Standard (NCCF-STD-TOF 02/2022) has been deleted. However, the reference still remained in NCCF-STD-ACR-ToF 01/2019.

Basic principles of the RAT:

- a) The RAT only applies to the ToF;
- b) The purpose of the RAT is to identify areas with high probability of non-conformances with ToF Standard within a defined geographical area that can range from 5 ha to an area of the whole state;
- c) The applicant for the RAT is an organisation procuring wood from a defined geographical area;
- d) The RAT is based on a Risk Assessment Study that is commissioned by the NCCF and conducted by two independent notified certification bodies;
- e) The decision on the Risk Assessment Study, respectively the outcoming risk is done by the NCCF;
- f) The Risk is valid for five years (unless conditions / factors do not change)
- g) The Risk Assessment Study results in “Low”, “Medium” and “High” risk;
- h) The resulting risk has fundamental impact on certification process:
 - **“Low Risk”** replaces the “ordinary” certification process and wood from the defined geographical area is considered as certified within the PEFC chain of custody; the applicant (the procurement company) shall sign a self-declaration and shall hold a valid PEFC chain of custody certificate.
 - **“Medium Risk”**: “ordinary” ToF certification is required. The surveillance audit is only required in the 2nd and 4th year of the certification cycle.
 - **“High Risk”**: “ordinary” ToF certification is required.

Comparison of the RAT approach with the “ordinary certification” based on ISO/IEC 17065

The RAT approach defined by the NCCF has some fundamental differences from conformity assessment practices outlined in ISO/IEC 17065 (but also ISO/IEC 17021-1) and in principle is an alternative (replaces) “ordinary” certification for areas where the risk is concluded as “low”.

The PEFC Council does not have, at this moment, benchmark requirements that would allow assessment of such module. Therefore, the following chapter provides comparison of a “third-party conformity assessment” of ToF based on ISO/IEC 17065 (or ISO/IEC 17021-1) with the proposed RAT module. The assessment is only done for situations where RAT results in “low risk” and “replaces” the “ordinary” certification process.

| Critical area | ISO/IEC 17065 | RAT ("low risk") |
|---|--|---|
| Applicant for evaluation | An entity that is responsible for implementation for ToF management and can introduce changes to the ToF management, i.e. landowner/manager of the ToF. | Company procuring raw material from ToF areas |
| Scope | Geographical area that is under the applicant managerial control | Geographical of the applicant procurement |
| Evaluation | <p>Evaluation conducted against a predefined set of requirements (the ToF Standard) and applicant's compliance with the Standard.</p> <p>The evaluation is defined by ISO/IEC 17065 and the NCCF's document.</p> | <p>Not clear. The document only describes that the evaluation is focused on a level of risk that the ToF management in a predefined area can result in non-conformances with the predefined set of requirements (the ToF standard).</p> <p>The risk assessment is not defined in detail.</p> |
| Body responsible for evaluation | Certification body | Certification body (respectively two independent certification bodies) |
| Decision-making body | Certification body (the certification body is a sole body responsible for the certification statement) | NCCF |
| Outcome | A certification body's statement on conformity with the ToF standard (Certification Attestation as per ISO/IEC 17065. | NCCF's statement on a risk (probability) of non-conformances with the standard |
| Impartiality | Impartiality of certification body as per ISO/IEC 17065 | <p>Impartiality of the certification body defined by ISO/IEC 17065.</p> <p>Impartiality of the NCCF is not defined</p> |
| Consequences of non-conformities | Non-conformities with the ToF requirements shall be resolved; they predetermine issuance and maintenance of the certification. | <p>Individual non-conformities found during the risk assessment predetermine the level of the risk.</p> <p>However, neither the non-conformities found during the RAT evaluation nor after its conclusion are required to be resolved.</p> <p>Non-conformities occurring after the conclusion of the RAT have not impact on validity of the RAT for the defined area.</p> |
| Continuous improvement | The continuous improvement is a part of the ToF Standard (see PEFC ST 1003:2018). The applicant (the certificate holder) is required to continuously improve the ToF | The RAT study is one-off evaluation. It does not support the continuous improvement as it does not apply to owners/manager of the ToF. |

| | | |
|--------------------------------|---|--|
| | management and certification confirms the performance. | |
| Complaints and disputes | Stakeholders have rights to influence the certification decision (during the whole validity of the certification) by formal complaints resolution process of the certification process. | Not defined. Although the certification body is required to be accredited against ISO/IEC 17065, it is expected that the RAT evaluation will be carried out outside the accreditation scope (the RAT evaluation is not certification). It is possible that the NCCF will open its own complaints resolution process for stakeholders to complain/dispute the outcomes of the RAT. |
| Accreditation | Allows accredited certification based on ISO/IEC 17065. | It is unlikely that the RAT evaluation would be covered by accreditation as it lacks some fundamental features of the third-party conformity assessment, e.g. certificate issuance. |

Conclusion

The RAT module is an innovative approach to deliver “certified material” from an area with ToF management. When the RAT evaluation results in “Low Risk”, it practically replaces the ordinary ToF certification based on ISO/IEC 17065 and allows wood from the defined area to enter the PEFC chain of custody as certified material.

The RAT approach (when resulting in “low risk”) results in procedures that **lack some fundamental** features of third-party conformity assessment (certification) as defined by ISO/IEC 17065 (and also ISO/IEC 17021).

The evaluation of the module against Annex 6 of the PEFC Technical Document is practically impossible as Annex 6 is strictly focused on third-party conformity assessment (certification) approach. Therefore, any PEFC endorsement of the RAT approach shall be based either on:

- c) An ad-hoc decision of the PEFC Council or
- d) A set of benchmark requirements developed by the PEFC Council for the purposes of “Risk based evaluation of wood sourcing”.

8.6.2.1 Assessment conclusions

The scheme’s requirements for forest management certification bodies, their accreditation and notification **comply** with the Annex 6 of the PEFC Technical Document **except for the RAT approach that is unable to meet the requirements of Annex 6** (mainly because Annex 6 approach is fundamentally different than the RAT approach).

The PEFC Council Board of Directors should make a decision on whether or not to make an ad hoc endorsement of the RAT approach within the NCCF certification scheme for the ToF certification.

| PEFC requirement | PEFC ST 2003:2020 |
|--------------------|---|
| Non-conformity No. | 8 |
| Type | Minor non-conformity |
| Description | <p>The RAT module is an innovative approach to deliver “certified material” from an area with ToF management. When the RAT evaluation results in “Low Risk”, it practically replaces the ordinary ToF certification based on ISO/IEC 17065 and allows wood from the defined area to enter the PEFC chain of custody as certified material.</p> <p>The RAT approach (when resulting in “low risk”) results in procedures that lack some fundamental features of third-party conformity assessment (certification) as defined by ISO/IEC 17065 (and also ISO/IEC 17021).</p> <p>The evaluation of the module against Annex 6 of the PEFC Technical Document is practically impossible as Annex 6 is strictly focused on third-party conformity assessment (certification) approach. Therefore, any PEFC endorsement of the RAT approach shall be based either on:</p> <ul style="list-style-type: none"> a) An ad-hoc decision of the PEFC Council or b) A set of benchmark requirements developed by the PEFC Council for the purposes of “Risk based evaluation of wood sourcing”. |

Annex A: Detailed assessment of the standard setting procedures and the standard setting process

| PEFC benchmark requirement | Assessment basis | YES /NO | Reference to system documentation (including quotation of relevant text) |
|---|------------------|---------|--|
| Standardising Body | | | |
| 5.1.1 The standardising body shall have written procedures for standard-setting activities describing: | | | |
| (a) its legal status and organisational structure, including a body responsible for consensus-building (working group, refer to 6.4) and procedures for formal adoption of the standard (refer to 7.1), | Procedures | YES | <p>NCCF's Memorandum of Association</p> <p>Article 4: "The aims and objects to be pursued by the Society are:</p> <p>XV To develop national standards for credible certification mechanism including the development of singly national standards that can be endorsed by several systems if appropriate".</p> <p>NCCF-STD-SSP-ToF</p> <p>"4.1. The development of certification standards shall be supported and coordinated by NCCF, as the standardization body".</p> <p>"5.8. The decision of the Standard Development Group to recommend the final draft for formal approval to the NCCF Governing Body shall be taken on the basis of a consensus. In case of any opposition the following processes can be used by the standard development group to reach an accord:...".</p> <p>"6.1. The NCCF Governing Body shall formally approve the standards based on evidence of consensus reached by the standard development group. All standards shall be approved by the Governing Body of NCCF".</p> <p>Compliance: Conformity</p> <p>Justification: The NCCF's Memorandum of Association indicate that the NCCF is the organization responsible for the development of the forest management standard(s) and scheme.</p> <p>The standard setting procedures then defines roles and responsibilities for the standardization work and indicates that the "Standard Development Group" is responsible for consensus building and the "NCCF's Governing Body" for formal approval of standards.</p> |
| (b) procedures for keeping documented information, | Procedures | YES | <p>NCCF-STD-SSP-ToF</p> <p>4.2. "The NCCF shall have written procedures for standard-setting activities describing: ...b. Procedures for keeping and maintaining records;...".</p> <p>Annex A defines procedures for records keeping and their public availability.</p> <p>Compliance: Conformity</p> <p>Justification: The document includes procedures for keeping documented information, respectively records.</p> |

| | | | |
|--|------------|-----|---|
| (c) procedures for balanced representation of stakeholders, | Procedures | YES | <p>NCCF-STD-SSP-ToF</p> <p>4.2. "The NCCF shall have written procedures for standard-setting activities describing:...c. Procedures for balanced representation of stakeholders; (Annex C)..."</p> <p>Annex C defines procedures to balanced representation.</p> <p>Compliance: Conformity</p> <p>Justification: The document includes procedures for balanced representation of stakeholders.</p> |
| (d) the standard-setting process, | Procedures | YES | <p>NCCF-STD-SSP-ToF</p> <p>4.2. "The NCCF shall have written procedures for standard-setting activities describing:...d. Standard-setting guidelines; (Refer Section 5)..."</p> <p>Section 5 describes the standard setting process.</p> <p>Compliance: Conformity</p> <p>Justification: The document includes procedures for standard setting process.</p> |
| (e) the mechanism for reaching consensus, and | Procedures | YES | <p>NCCF-STD-SSP-ToF</p> <p>4.2. "The NCCF shall have written procedures for standard-setting activities describing:...e. Mechanism for reaching consensus; (Refer Section 5.8)..."</p> <p>Section 5.8 describes procedures for reaching consensus.</p> <p>Compliance: Conformity</p> <p>Justification: The document includes procedures for reaching consensus.</p> |
| (f) review and revision of standard(s)/normative document(s). | Procedures | YES | <p>NCCF-STD-SSP-ToF</p> <p>4.2. "The NCCF shall have written procedures for standard-setting activities describing:...f. Approval and Revision of standards/normative documents (Refer Section 6)</p> <p>Compliance: Conformity</p> <p>Justification: The document includes procedures for review and revision.</p> |
| 5.1.2 The standardising body shall make its standard-setting procedures publicly available and shall review its standard-setting procedures regularly. The review shall consider feedback from stakeholders. | Procedures | YES | <p>NCCF-STD-SSP-ToF</p> <p>4.3 "The NCCF shall make its standard-setting procedures publicly available".</p> <p>5.4 "5.4 The NCCF shall review the Standard setting process and procedures based on comments received from public announcement and establish a standard development group or adjust the composition of an already existing standard development group, based on received nominations. The acceptance and refusal of nominations shall be justifiable in relation to the requirements for balanced representation of the standard development group and resources available for the standard-setting".</p> <p>Compliance: Conformity</p> |

| | | | |
|---|----------------|-----|---|
| | | | <p>Justification: The standard setting procedures state that the document shall be publicly available and require that the procedures shall be reviewed based on comments received from public announcement.</p> |
| | Proce ss | YES | <p>Public availability of the standard setting procedures: The NCCF has published its standard setting procedures at its website^[1]. The document is easily accessible through the NCCF's website structure "Resources / Document centre".</p> <p>Compliance: Conformity</p> <p>Justification: The standard setting procedures have been made publicly available and are easily accessible at the NCCF's website.</p> <p>Review of the standard setting procedures:</p> <p>The NCCF has reviewed and revised its standard setting procedures in 2018 with a new document (NCCF-STD-SSP-ToF) being published in December 2018.</p> <p>The content of NCCF-STD-SSP-ToF and the standard setting process has been discussed by the Standard Development Group (SDG)^[2] a multistakeholder body.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The NCCF reviewed the standard setting procedures taking into considering stakeholders views.</p> |
| 5.2.1 The standardising body shall keep documented information relevant to the standard-setting and review process. Evidence of compliance with the requirements of this standard and the standardising body's own procedures includes: | | | |
| (a) Standard-setting procedures, | Proce dures | YES | <p>NCCF-STD-SSP-ToF</p> <p>4.2 "The NCCF shall have written procedures for standard-setting activities describing;..."</p> <p>Compliance: Conformity</p> <p>Justification: The scheme requires to keep standard setting procedures (NCCF-STD-SSP-ToF).</p> |
| | Proce ss | YES | <p>The NCCF has developed standard setting procedures ((NCCF-STD-SSP-ToF) that is available at the NCCF's^[1].</p> <p>Compliance: Conformity</p> <p>Justification: The scheme keeps standard setting procedures and makes it publicly available through its website.</p> |
| (b) Stakeholder identification mapping, | Proce dures | YES | <p>NCCF-STD-SSP-ToF</p> <p>4.4 "The NCCF shall keep records relating to the standard-setting process, providing evidence of compliance with the requirements of this document as well as its own procedures. The records shall be kept for a minimum of five years and shall be available to interested parties upon request".</p> <p>Annex B defines procedures for keeping the records.</p> |

| | | | |
|--|------------|-----|---|
| | | | <p>Annex C : a) “The NCCF shall identify and map stakeholders relevant to the objectives and scope of the standard-setting process”.</p> <p>Compliance: Conformity</p> <p>Justification: NCCF-STD-SSP-ToF includes general requirement to keep records (documented information) related to the standard setting process providing evidence of compliance with (NCCF-STD-SSP-ToF).</p> <p>Although NCCF-STD-SSP-ToF does not explicitly state that the C: stakeholders identification mapping is to be “documented information”, the requirements for stakeholders mapping is explicit in NCCF-STD-SSP-ToF (5.1, 5.2, Annex C) and the records keeping stipulated in 4.2 automatically applies to it.</p> |
| | Process | YES | <p>The NCCF provided two document identifying stakeholders that was prepared in March 2017 and then an actual one updated during the process^[3,4].</p> <p>Compliance: Conformity</p> <p>Justification: The NCCF keeps records on stakeholders mapping.</p> |
| (c) Contacted and/or invited stakeholders | Procedures | YES | <p>NCCF-STD-SSP-ToF</p> <p>4.4 “The NCCF shall keep records relating to the standard-setting process, providing evidence of compliance with the requirements of this document as well as its own procedures. The records shall be kept for a minimum of five years and shall be available to interested parties upon request”.</p> <p>Annex B defines procedures for keeping the records.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>NCCF-STD-SSP-ToF includes general requirement to keep records (documented information) related to the standard setting process providing evidence of compliance with (NCCF-STD-SSP-ToF).</p> <p>Although NCCF-STD-SSP-ToF does not explicitly state that the process [“contacted and/or invited stakeholders” are to be considered as “documented information”, the requirement for direct mailing of stakeholders is explicit in NCCF-STD-SSP-ToF (5.3, 5.6) and the records keeping stipulated in 4.2 automatically applies to it.</p> |
| | Process | YES | <p>The NCCF provided copies of email correspondence relating to the announcement of the standard setting process and invitation to participate^[48] and e-mail correspondence relating to public consultation^[5, 49].</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The NCCF keeps records of email communication with its stakeholders, including invitation of stakeholders to participate in the process and in public consultation.</p> |
| (d) Stakeholders involved in standard-setting activities including participants in | Procedures | YES | <p>NCCF-STD-SSP-ToF</p> <p>4.4 “The NCCF shall keep records relating to the standard-setting process, providing evidence of compliance with the requirements of this document as well as its own procedures. The records shall</p> |

| | | | |
|---|------------|-----|---|
| each working group meeting, | | | <p>be kept for a minimum of five years and shall be available to interested parties upon request".</p> <p>Annex B defines procedures for keeping the records.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>NCCF-STD-SSP-ToF includes general requirement to keep records (documented information) related to the standard setting process providing evidence of compliance with (NCCF-STD-SSP-ToF).</p> <p>Although NCCF-STD-SSP-ToF does not explicitly state that the consultation ["contacted and/or invited stakeholders" are to be considered as "documented information", the requirement for direct mailing of stakeholders is explicit in NCCF-STD-SSP-ToF (5.5) and the records keeping stipulated in 4.2 automatically applies to it.</p> |
| | Process | YES | <p>The NCCF provided requested evidence relating to the membership of the SDG / TWG (Annex D) as well as minutes of the requested meetings of the SDG and TWG^[15-27] showing participation of the members in the standardisation activities.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The NCCF keeps records of the stakeholders participating in the standardization activities and keeps detailed and comprehensive minutes of the SDG and TWG meetings.</p> |
| (e) Feedback received and a synopsis of how feedback was addressed, | Procedures | YES | <p>NCCF-STD-SSP-ToF</p> <p>4.4 "The NCCF shall keep records relating to the standard-setting process, providing evidence of compliance with the requirements of this document as well as its own procedures. The records shall be kept for a minimum of five years and shall be available to interested parties upon request".</p> <p>Annex B defines procedures for keeping the records.</p> <p>"The comments received from the stakeholders after each consultation for the particular standards, shall also be maintained along with that of the particular document".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>NCCF-STD-SSP-ToF includes general requirement to keep records (documented information) related to the standard setting process providing evidence of compliance with (NCCF-STD-SSP-ToF).</p> <p>Annex B includes requirements for keeping the received stakeholders comments.</p> <p>Although NCCF-STD-SSP-ToF does not explicitly state that the stakeholders' "feedback and synopsis" are to be considered as "documented information", the requirements for consideration of the feedback and public availability of the synopsis are explicit in NCCF-STD-SSP-ToF (5.6 f, g) and the records keeping stipulated in 4.2 automatically applies to it.</p> |
| | Process | YES | <p>The NCCF keeps a list of all received comments with responses and actions taken^[6]. The list has been made publicly available at the NCCF's website^[7].</p> |

| | | | |
|--|----------------|-----|---|
| | | | Compliance: Conformity Justification: The NCCF keeps records on comments received from stakeholders. |
| (f) All drafts and final versions of the standard, | Proce dures | YES | NCCF-STD-SSP-ToF 4.4 “The NCCF shall keep records relating to the standard-setting process, providing evidence of compliance with the requirements of this document as well as its own procedures. The records shall be kept for a minimum of five years and shall be available to interested parties upon request”. Annex B defines procedures for keeping the records. Compliance: Conformity Justification: NCCF-STD-SSP-ToF includes general requirement to keep records (documented information) related to the standard setting process providing evidence of compliance with (NCCF-STD-SSP-ToF). Although NCCF-STD-SSP-ToF does not explicitly state that “all drafts of the standard” are to be considered as “documented information”, the requirement for availability of draft standards is explicit in NCCF-STD-SSP-ToF (5.5) and the records keeping stipulated in 4.2 automatically applies to it. |
| | Proce ss | YES | Compliance: Conformity Justification: As a part of the evaluation, the NCCF provided several evidences that confirmed that different versions of the forest management standard have been kept. The versions have been provided to members of the TWG and SDG ^[15-27] . |
| (g) Outcomes from working group considerations, | Proce dures | YES | NCCF-STD-SSP-ToF 4.4 “The NCCF shall keep records relating to the standard-setting process, providing evidence of compliance with the requirements of this document as well as its own procedures. The records shall be kept for a minimum of five years and shall be available to interested parties upon request”. Annex B defines procedures for keeping the records. “The Records of the Standard Development Group Minutes of Meetings in the Process of the Standard Setting shall be maintained separately”. Compliance: Conformity Justification: NCCF-STD-SSP-ToF includes general requirement to keep records (documented information) related to the standard setting process providing evidence of compliance with (NCCF-STD-SSP-ToF). Annex B includes the requirement for keeping minutes of the SDG (Annex B). |
| | Proce ss | YES | The NCCF kept minutes of the SDG / TWG meetings ^[15-27] that include outcomes of the meetings. |

| | | | |
|--|----------------|-----|--|
| | | | Compliance: Conformity Justification: The NCCF keeps records on the SDG's meetings. |
| (h) Evidence of consensus on the final version of the standard(s), | Proce dures | YES | NCCF-STD-SSP-ToF 4.4 "The NCCF shall keep records relating to the standard-setting process, providing evidence of compliance with the requirements of this document as well as its own procedures. The records shall be kept for a minimum of five years and shall be available to interested parties upon request". Annex B defines procedures for keeping the records. "The Records of the Standard Development Group Minutes of Meetings in the Process of the Standard Setting shall be maintained separately". Compliance: Conformity Justification: NCCF-STD-SSP-ToF includes general requirement to keep records (documented information) related to the standard setting process providing evidence of compliance with (NCCF-STD-SSP-ToF). Although NCCF-STD-SSP-ToF does not explicitly state that "evidence of consensus" are to be considered as "documented information", this is covered by the requirement for keeping minutes of the SDG (Annex B). |
| | Proce ss | YES | The SDG approved the final draft standard at its last meeting of 16 February 2019 with an additional two weeks comment period and final decision being made by a postal ballot ^[16, 45] . Additional comments of the SDG members as well as results of their consideration and the final SDG vote has been well recorded ^[28-30] . Compliance: Conformity Justification: The NCCF keeps records on the SDG's decisions. |
| (i) Evidence relating to the review process, and | Proce dures | YES | NCCF-STD-SSP-ToF 4.4 "The NCCF shall keep records relating to the standard-setting process, providing evidence of compliance with the requirements of this document as well as its own procedures. The records shall be kept for a minimum of five years and shall be available to interested parties upon request". Annex B defines procedures for keeping the records. "The records of the revision period of the standards shall be maintained in a separate file". Compliance: Conformity Justification: NCCF-STD-SSP-ToF includes general requirement to keep records (documented information) related to the standard setting |

| | | | |
|--|------------|-----|--|
| | | | <p>process providing evidence of compliance with (NCCF-STD-SSP-ToF).</p> <p>Annex B includes an explicit requirement for keeping records on the revision.</p> <p>Although NCCF-STD-SSP-ToF does not explicitly state that “records on review process” are to be considered as “documented information”, the requirements for the review process are explicit in NCCF-STD-SSP-ToF (6.3) and the records keeping stipulated in 4.2 automatically applies to it.</p> |
| | Process | N/A | <p>The ToF standard is the first edition of the standard.</p> <p>Compliance: Not applicable</p> <p>Justification:</p> <p>The ToF standard has been developed as the first edition of the standard and as such the “review” and “revision” of the standard is not applicable to this process.</p> |
| (j) Final approval by the standardising body. | Procedures | YES | <p>NCCF-STD-SSP-ToF</p> <p>4.4 “The NCCF shall keep records relating to the standard-setting process, providing evidence of compliance with the requirements of this document as well as its own procedures. The records shall be kept for a minimum of five years and shall be available to interested parties upon request”.</p> <p>Annex B defines procedures for keeping the records.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>NCCF-STD-SSP-ToF includes general requirement to keep records (documented information) related to the standard setting process providing evidence of compliance with (NCCF-STD-SSP-ToF).</p> <p>Although NCCF-STD-SSP-ToF does not explicitly state that the “records on final approval” are to be considered as “documented information”, the requirements for the final approval are explicit in NCCF-STD-SSP-ToF (6.1) and the records keeping stipulated in 4.2 automatically applies to it.</p> |
| | Process | YES | <p>The formal approval of the ToF standard by the NCCF Governing Body is formally recorded in the minutes of the NCCF Governing Body’s meeting of 10 August 2019^[45].</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The NCCF keeps records on the formal approval of the ToF standard.</p> |
| 5.2.2 Documented information shall be kept until completion of the next review or revision of the standard to which they refer. Otherwise the documented information must be kept for a minimum of | Procedures | YES | <p>NCCF-STD-SSP-ToF</p> <p>4.4: “Documented information shall be kept until completion of the next review or revision of the standard. Otherwise, the documented information must be kept for a minimum of five years after publication of the standard”.</p> <p>Annex B: “The following records shall be kept for a minimum of five years and should be available to interested parties upon request”.</p> |

| | | | |
|---|----------------|-----|--|
| five years after publication of the standard. | | | Compliance: Conformity Justification: NCCF-STD-SSP-ToF requires to keep records until completion of the next review or revision of the standard with five years as a minimum. |
| | Proce ss | YES | The process refers to a development of a first edition of the standard. However, the assessment checked records related to the development of the SFM standard that was completed in 2018 and records relating to the standard setting process are still kept by the NCCF in their computer hard drive, as well as they continue to be published at the NCCF's website. Compliance: Conformity Justification: The NCCF still retains records from the development of the NCCF's SFM standard. |
| 5.2.3 Documented information shall be available to interested parties upon request. | Proce dures | YES | NCCF-STD-SSP-ToF Annex B: "The following records shall be kept for a minimum of five years and should be available to interested parties upon request." Compliance: Conformity Justification: NCCF-STD-SSP-ToF satisfies the PEFC requirements. |
| | Proce ss | YES | The documented information was available to stakeholders. Critical information relating to the ToF standard setting was also published at the NCCF's website. Compliance: Conformity Justification: The evidence provided by the applicant (see chapter 6) do not indicate that the NCCF refused any request from a stakeholder for documented information retained. This was also verified during stakeholders interviews conducted as a part of the in-country visit. |
| 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, | Proce dures | YES | NCCF-STD-SSP-ToF 4.6: "The NCCF shall follow the procedures for complaints and appeals investigation and resolution (NCCF DRP: 01/2019), which will be accessible to stakeholders, for dealing with any substantive and procedural complaints relating to the standardizing activities. NCCF-STD-DRP-ToF 6.6 "The DG shall acknowledge receipt of all disputes in writing after receiving the complaint and forward the same to the DRC". 7.6 "The DG shall make an entry in the appeals register, acknowledge the appeal and inform the appellant that it will be kept informed of the progress". |

| | | | |
|---|------------|-----|--|
| | | | <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard setting procedures (NCCF-STD-SSP-ToF) makes reference to the NCCF's complaints and appeals procedures (NCCF-STD-DRP-ToF). The NCCF is required to acknowledge the receipt of complaints and appeals.</p> |
| | Process | YES | <p>The NCCF claims that it has received no complaint relating to the standard setting activities^[8].</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The NCCF's claim was verified during stakeholders interviews conducted as a part of the in-country visit.</p> |
| (b) gather and verify all necessary information to validate the complaint or appeal, evaluate the subject matter of the complaint or appeal impartially and objectively, and make a decision regarding the complaint or appeal, | Procedures | YES | <p>NCCF-STD-SSP-ToF</p> <p>4.6: "The NCCF shall follow the procedures for complaints and appeals investigation and resolution (NCCF DRP: 01/2019), which will be accessible to stakeholders, for dealing with any substantive and procedural complaints relating to the standardizing activities.</p> <p>NCCF-STD-DRP-ToF</p> <p>6.8 "For complaints related to NCCF, the investigating authority (DRC chair) shall examine the complaint, call for any details and investigate it in the appropriate manner, without any prejudice. If felt necessary, investigating authority may give an opportunity to the complainant and the party complained against, to be heard in person during investigations".</p> <p>6.9. "Additional information may be requested from the complainant, the defendant, third parties named as sources of information in the complaint or other Parties likely to have information relevant to the investigation".</p> <p>7.8 Under normal circumstances DRC shall decide on the dispute solely on the basis of the briefs submitted to them. In exceptional circumstances, the DRC may do any or all of the following: a. request supplemental briefing on any pertinent matter from any of the parties to the dispute; b. seek assistance from the Secretariat; c. seek the assistance of consultants or outside experts; and/or d. hold site visits, oral hearings or other proceedings that might help resolve the dispute. e. may give opportunity of being heard in person to both sides".</p> <p>7.9. "The Appellant has the right to object to the appointment of any member of the DRC, with valid reason(s), such as conflict of interest. The DRC may consist of only one person if appropriate knowledge, independence and impartiality can be demonstrated".</p> <p>7.10. "The appeals committee, after considering the relevant facts, shall evaluate, validate and record its decision".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard setting procedures (NCCF-STD-SSP-ToF) makes reference to the NCCF's complaints and appeals procedures (NCCF-STD-DRP-ToF). The NCCF is required to gather relevant</p> |

| | | | |
|---|------------|-----|--|
| | | | information, impartially investigate received complaints/appeals and make decisions. |
| | Process | YES | <p>The NCCF claims that it has received no complaint relating to the standard setting activities^[8].</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The NCCF's claim was verified during stakeholders interviews conducted as a part of the in-country visit.</p> |
| (c) formally communicate the decision on the complaint or appeal to the complainant and describe the handling process. | Procedures | YES | <p>NCCF-STD-SSP-ToF</p> <p>4.6: "The NCCF shall follow the procedures for complaints and appeals investigation and resolution (NCCF DRP: 01/2019), which will be accessible to stakeholders, for dealing with any substantive and procedural complaints relating to the standardizing activities.</p> <p>NCCF-STD-DRP-ToF</p> <p>6.10. "The investigating authority shall record its decision which will be communicated by the NCCF secretariat to the complainant".</p> <p>7.12. The NCCF Secretariat shall communicate the outcome of the appeals process to the appellant of the decision being taken".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard setting procedures (NCCF-STD-SSP-ToF) makes reference to the NCCF's complaints and appeals procedures (NCCF-STD-DRP-ToF). The NCCF is required to communicate the results of the investigation to the complainant/appellant.</p> |
| | Process | YES | <p>The NCCF claims that it has received no complaint relating to the standard setting activities^[8].</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The NCCF's claim was verified during stakeholders interviews conducted as a part of the in-country visit.</p> |
| 5.3.2 The standardising body shall establish at least one contact point for enquiries, complaints and appeals relating to its standard-setting activities. The contact point shall be easy to access and readily available. | Procedures | YES | <p>NCCF-STD-SSP-ToF</p> <p>4.6: "The NCCF shall follow the procedures for complaints and appeals investigation and resolution (NCCF DRP: 01/2019), which will be accessible to stakeholders, for dealing with any substantive and procedural complaints relating to the standardizing activities.</p> <p>NCCF-STD-DRP-ToF</p> <p>6.5. "The Director General (DG), NCCF is nominated person for receiving the complaints and forwarding the same to the DRC Chair along with the relevant information and documents. He will be assisted by the secretariat staff of NCCF".</p> <p>7.6. "The DG shall make an entry in the appeals register, acknowledge the appeal and inform the appellant that it will be kept informed of the progress".</p> |

| | | | |
|--|------------|-----|---|
| | | | Compliance: Conformity Justification: The standard setting procedures (NCCF-STD-SSP-ToF) makes reference to the NCCF's complaints and appeals procedures (NCCF-STD-DRP-ToF). The NCCF's Director General is nominated as the contact point for complaints/appeals. |
| | Process | YES | Compliance: Conformity Justification: The complaints procedures (NCCF-STD-DRP-ToF) and contact person indicated in the document are easily accessible through the NCCF's website. |
| Standard-setting process | | | |
| 6.1.1 For the creation of a new standard, the standardising body shall develop a proposal including: | | | |
| (a) the scope of the standard, | Procedures | YES | NCCF-STD-SSP-ToF 5.2: "For the creation of a new standard, the standardizing body shall develop a concept paper/proposal including: a. the scope of the standard, b. justification of the need for the standard, c. a clear description of the intended outcomes, d. a risk assessment of potential negative impacts arising from implementing the standard, such as; • factors that could affect the achievement of the outcomes negatively, • unintended consequences of implementation, • actions to address the identified risks, e. description of the stages of standard development and their expected timetable. Note: The concept paper shall be used while communicating with stakeholders." Compliance: Conformity Justification: The standard setting procedures require to develop a "concept paper" with the scope of the standard to be developed. |
| | Process | YES | The NCCF developed two documents outlining the development of a ToF standard: - Concept note that outlines principal concepts in the development to the ToF standard as well as basic stages in the development of such a standard ^[9] ; - Project proposal for the development of the ToF standard ^[10] with detailed description of the project, including its objectives and components (scope). Compliance: Conformity |

| | | | |
|---|------------|-----|---|
| | | | Justification: The NCCF developed two documents outlining the scope of the standard setting work. Both documents describe scope of the standard setting work. |
| (b) a justification of the need for the standard, | Procedures | YES | NCCF-STD-SSP-ToF 5.2: "For the creation of a new standard, the standardizing body shall develop a concept paper/proposal including: a. the scope of the standard, b. justification of the need for the standard, c. a clear description of the intended outcomes, 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, e. description of the stages of standard development and their expected timetable. Note: The concept paper shall be used while communicating with stakeholders." " Compliance: Conformity Justification: The standard setting procedures require to develop a "concept paper" with the justification for need of the standard to be developed. |
| | Process | YES | The NCCF developed two documents outlining the development of a ToF standard: <ul style="list-style-type: none"> Concept note that outlines principal concepts in the development to the ToF standard as well as basic stages in the development of such a standard^[9]; Project proposal for the development of the ToF standard^[10] with detailed description of the project, its need and justification. Compliance: Conformity Justification: The NCCF developed two documents outlining the development of the ToF standards. Both documents describe justification and need of the ToF standard. |
| (c) a clear description of the intended outcomes | Procedures | YES | NCCF-STD-SSP-ToF 5.2: "For the creation of a new standard, the standardizing body shall develop a concept paper/proposal including: a. the scope of the standard, b. justification of the need for the standard, c. a clear description of the intended outcomes, |

| | | | |
|--|----------------|-----|---|
| | | | <p>d. a risk assessment of potential negative impacts arising from implementing the standard, such as;</p> <ul style="list-style-type: none"> • factors that could affect the achievement of the outcomes negatively, • unintended consequences of implementation, • actions to address the identified risks, <p>e. description of the stages of standard development and their expected timetable.</p> <p>Note: The concept paper shall be used while communicating with stakeholders."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard setting procedures require to develop a "concept paper" with the intended outcomes of the standard development.</p> |
| | Proce ss | YES | <p>The NCCF developed two documents outlining the development of a ToF standard:</p> <ul style="list-style-type: none"> - Concept note that outlines principal concepts in the development to the ToF standard as well as basic stages in the development of such a standard^[9]; - Project proposal for the development of the ToF standard^[10] with detailed description of the project and its outcomes. <p>Compliance: Conformity</p> <p>Justification:</p> <p>The NCCF developed two documents outlining the development of the ToF standards. Especially the project proposal^[10] includes outcomes of the project (chapter Outcomes).</p> |
| <p>(d) a risk assessment of potential negative impacts arising from implementing the standard, such as</p> <ul style="list-style-type: none"> • factors that could affect the achievement of the outcomes negatively, • unintended consequences of implementation, • actions to address the identified risks, and | Proce dures | YES | <p>NCCF-STD-SSP-ToF</p> <p>5.2: "For the creation of a new standard, the standardizing body shall develop a concept paper/proposal including:</p> <ol style="list-style-type: none"> a. the scope of the standard, b. justification of the need for the standard, c. a clear description of the intended outcomes, 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, <p>e. description of the stages of standard development and their expected timetable.</p> <p>Note: The concept paper shall be used while communicating with stakeholders.""</p> <p>Compliance: Conformity</p> <p>Justification:</p> |

| | | | |
|---|----------------|-----|---|
| | | | The standard setting procedures require to develop a “concept paper” with the risk assessment to be included. |
| | Proce ss | NO | <p>The NCCF developed two documents outlining the development of a ToF standard:</p> <ul style="list-style-type: none"> - Concept note that outlines principal concepts in the development to the ToF standard as well as basic stages in the development of such a standard^[9]; - Project proposal for the development of the ToF standard^[10] with detailed description of the project, its need and justification and actions to achieve the intended outcomes. <p>Compliance: Minor non-conformity - justifiable</p> <p>Justification:</p> <p>The NCCF developed two documents outlining the development of the ToF standards. Especially the project proposal^[10] includes detailed description of the project, its needs, intended outcomes, stages and budget to achieve the outcomes.</p> <p>However, neither of the documents describes the risk relating to the standardisation work or factors that could negatively influence the standard development and implementation.</p> <p>The compliance with the PEFC requirement was classified as “minor non-conformity – justifiable” as the standard setting process started and this stage was executed (2016) before publication of this requirement (PEFC ST 1001:2017).</p> |
| (e) a description of the stages of standard development and their expected timetable. | Proce dures | YES | <p>NCCF-STD-SSP-ToF</p> <p>5.2: “For the creation of a new standard, the standardizing body shall develop a concept paper/proposal including:</p> <ol style="list-style-type: none"> the scope of the standard, justification of the need for the standard, a clear description of the intended outcomes, 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, description of the stages of standard development and their expected timetable. <p>Note: The concept paper shall be used while communicating with stakeholders.”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard setting procedures require to develop a “concept paper” with the stages and timetable to be included.</p> |
| | Proce ss | YES | The NCCF developed two documents outlining the development of a ToF standard: |

| | | | |
|--|------------|-----|--|
| | | | <ul style="list-style-type: none"> - Concept note that outlines principal concepts in the development to the ToF standard as well as basic stages in the development of such a standard^[9]; - Project proposal for the development of the ToF standard^[10] with detailed description of the project, its stages and timetable. <p>Compliance: Conformity</p> <p>Justification:</p> <p>The NCCF developed two documents outlining the development of the ToF standards. Especially the project proposal^[10] includes detailed description of the project stages and related timetable (chapter Methodology and chapter Timetables).</p> |
| 6.1.2 For the revision of a standard the proposal shall cover at least (a) and (e) of clause 6.1.1. | Procedures | YES | <p>NCCF-STD-SSP-ToF</p> <p>"5.2: "For the creation of a new standard, the standardizing body shall develop a concept paper/proposal including:</p> <ol style="list-style-type: none"> the scope of the standard, justification of the need for the standard, a clear description of the intended outcomes, 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, description of the stages of standard development and their expected timetable. <p>Note: The concept paper shall be used while communicating with stakeholders."</p> <p>8.5: "Procedures for revision of standard(s)/normative document(s) shall conform to those stated in section 5."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>NCCF applies the same requirements (chapter 5) for the development of a new standard as well as for its revision. Therefore, chapter 5.2 shall also fully apply to the revision of the standard.</p> |
| | Process | N/A | <p>Compliance: Not applicable</p> <p>Justification:</p> <p>The standard setting process resulted in a first edition of the ToF standard.</p> |
| 6.2.1 The standardising body shall identify stakeholders relevant to the objectives and scope of the standard-setting activities by means of a stakeholder | Procedures | YES | <p>NCCF-STD-SSP-ToF</p> <p>5.1: "The NCCF 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 standardizing body shall identify the</p> |

| | | | |
|--|---------|-----|---|
| <p>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.</p> | | | <p>likely key issues, key stakeholders, and which means of communication would be best to reach them.”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard setting procedures require to identify relevant stakeholders through a stakeholder mapping, identification of relevant stakeholder groups, the likely key issues, key stakeholders and means of communication.</p> |
| | Process | YES | <p>The development report indicates that the NCCF followed 8 stakeholder groups defined by Agenda 21: • Government Authorities • Business and Industry • Farmers • Forestry Professionals • Non-Governmental Organizations (NGOs) • Research and Scientific Organisations • International Stakeholders • Children and Youth.</p> <p>The development report also indicates that the stakeholders mapping was completed before July-August 2016 when an invitation was sent out to all mapped stakeholders.</p> <p>The NCCF provided an updated stakeholders mapping table from March 2017^[2] and then an updated stakeholders mapping table^[3].</p> <p>The stakeholder mapping tables^[2,3] include stakeholders and their contact details organised in the following categories:</p> <ul style="list-style-type: none"> - Paper mills and others (14); - Plywood industry and traders (16); - Sawmills and traders (3); - Handicraft and furniture industry (143); - Government institutions (50); - NGOs (104); - Miscellaneous (200); - Business associations (119); - Multilateral funding agencies (70); - Research institutes (125); - PEFC stakeholders (14). <p>The stakeholders mapping table does not include “workers and trade unions” and “children and youth” as a separate stakeholder group. However, it identifies organisations such as BWI and ILO as stakeholders relevant to the standard setting process under another stakeholder groups (Traders, Others). Concerning the “youth and children” category, organisations that also represent or have the topic within their agenda (e.g. as a part of sustainable development) are identified under NGOs stakeholder group.</p> <p>The stakeholder mapping tables^[2,3] include identification of “suggested members of SDG” that represents those stakeholders that are key to the standard setting process.</p> <p>The Project Proposal document^[10] describes in detail the current situation of the ToF management and relevant issues as well as stakeholder groups that are key drivers for the ToF management and standard setting. This implicitly defines the key issues that are relevant to different stakeholder groups. In the beginning of the standard setting process, the NCCF enlarged the SDG by contacting and inviting additional stakeholders to join the group^[50]. The communication included description of key issues for four groups that the extension of the SDG was mainly focused on.</p> <p>The Project Proposal document^[10] also defines the key communication tools and channels that are common for all stakeholder groups.</p> <p>Compliance: Conformity</p> |

| | | | |
|---|----------------|-----|--|
| | | | <p>Justification:</p> <p>The NCCF identified relevant stakeholders, the stakeholder categories, key issues for stakeholder categories, key stakeholders and means of communication.</p> <p>Some elements of the stakeholders mapping are included in another documents, e.g. Project Proposal^[10] or invitation email, than in the stakeholder mapping table itself.</p> <p>The conformity statement has taken into consideration the fact that the stakeholder mapping stage took place in 2016 before the latest edition of PEFC ST 1001 (2017) was published and the previous PEFC requirements (PEFC ST 1001:2010) where less explicit.</p> |
| <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> | Proce dures | YES | <p>NCCF-STD-SSP-ToF</p> <p>5.1: "The NCCF 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 standardizing body shall identify the likely key issues, key stakeholders, and which means of communication would be best to reach them."</p> <p>4.5 "The NCCF shall establish a Standard Development Group (SDG) responsible for standard-setting activities. The standard development group shall:</p> <p>b. Have balanced representation and decision-making by stakeholder categories. NCCF should take reference from the categories mentioned in the UN Agenda 21, relevant to the subject matter for balanced representation of stakeholders within the SDG in sectors of environment, economic, social (workers' trade union, communities in and around forests, forest dwellers, tribals), certification bodies, forestry institutions, accreditation bodies and relevant government agencies where single concerned interests should not dominate nor be dominated in the process;"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard setting procedures require to identify all relevant stakeholder groups. The requirements for the composition of the SDG group then make an explicit reference to stakeholder categories as per UN Agenda 21.</p> |
| | Proce ss | YES | <p>See description of the stakeholders mapping in 6.2.1.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The NCCF's stakeholder identification covers several stakeholder groups including business and industry; government institutions; NGOs; miscellaneous; multilateral funding agencies; research institutes; PEFC stakeholders.</p> <p>Those broadly cover the UN Agenda 21 categories required by the PEFC requirement except indigenous people and workers and trade unions.</p> <p>However, it identifies organisations such as BWI and ILO as stakeholders relevant to the standard setting process under another stakeholder groups (Traders, Others).</p> <p>Though India has ratified ILO convention, the Govt. continues to deny the term and concept of "indigenous peoples" claiming that all Indians are indigenous. Though India has enacted The Forest</p> |

| | | | |
|--|----------------|-----|--|
| | | | <p>Rights Act (FRA) 2006, which recognizes the rights of the forest dwelling tribal communities and other traditional forest dwellers to forest resources, this act is outside of the scope of ToF.</p> <p>The conformity statement has taken into consideration the fact that the stakeholder mapping stage took place in 2016 before the latest edition of PEFC ST 1001 (2017) was published and the PEFC requirements 6.2.2 was not included in the previous version (PEFC ST 1001:2010).</p> |
| <p>6.2.3 The standardising body shall identify disadvantaged stakeholders and key stakeholders and address any constraints to their participation in standard-setting activities.</p> <p>NOTE A stakeholder can be both a disadvantaged and a key stakeholder at the same time.</p> | Proce dures | YES | <p>NCCF-STD-SSP-ToF</p> <p>Annex C, b: “The NCCF shall identify key and disadvantaged stakeholders. The standardizing body shall address the constraints of their participation and proactively seek their participation and contribution in the standard-setting activities”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard setting procedures require to identify the key and disadvantaged stakeholders and to address their constraints.</p> |
| | Proce ss | NO | <p>See description of the stakeholder mapping under the PEFC requirement 6.2.1.</p> <p>Compliance: Minor non-conformity</p> <p>Justification:</p> <p>The stakeholders mapping^[9,10] includes identification of key stakeholders as a part of the “suggested SDG members” sheet.</p> <p>The stakeholders mapping^[9,10] does not identify “disadvantaged stakeholders”. The NCCF response^[51] that “disadvantaged stakeholders were not identified” was not found sufficient to justify whether or not there can be ToF relevant stakeholders that would be disadvantaged from the participation in the ToF standard setting process, being on basis of available resources, language, social status, etc.</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> | Proce dures | YES | <p>NCCF-STD-SSP-ToF</p> <p>5.3. “The NCCF 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. The announcement and invitation shall include:</p> <ul style="list-style-type: none"> a) overview of the standard-setting process, b) access to the concept paper for the standard, c) information about opportunities for stakeholders to participate in the process, d) requests to stakeholders to nominate their representative(s) or themselves to the working group. The request to disadvantaged stakeholders and key stakeholders shall be made in a manner that ensures that the information reaches intended recipients and in a format that is easy to understand, |

| | | | |
|--|----------------|-----|--|
| <p>NOTE 1 <i>In a timely manner</i> means (at the latest) four weeks before the first standard-setting activity is scheduled to occur.</p> <p>NOTE 2 <i>Through suitable media</i> means at least through the standardising body's website and by email and/or letter to identified stakeholders. Other media includes press releases, news articles, features in trade-press, information sent to branch organisations, social media, digital media, etc.</p> | | | <p>e) explicit invitation and clear instruction on how to submit feedback on the scope and standard setting process, and</p> <p>f) access to the standard-setting procedures.</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 direct invitation viz. email and/or letter to identified stakeholders. Other media includes press releases, news articles, features in trade-press, information sent to branch organizations, social media, digital media, etc.”:</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard setting procedures are identical with the PEFC requirement.</p> |
| | Proce ss | NO | <p>The Development report indicates that the public announcement was made at the NCCF's website on 26 June 2016 and that the an “Expression of Interest” (Eol)^[11] was emailed to identified stakeholders^[48]. The Eol includes an application for membership in the SDG and outlines basic rules of the SDG work. The Eol has been published at the NCCF's website^[12].</p> <p>Compliance: Minor non-conformity</p> <p>Justification:</p> <p>The public announcement referenced in the Development Report is not working due to migration of the original NCCF website while the NCCF did not take a screenshot of that website. Therefore, the publication of the announcement, its timing and content cannot be verified.</p> <p>The public announcement was communicated to stakeholders by e-mail^[48] in July, August and October 2016. However, the email recipients do not cover all identified stakeholders but rather only those that were considered as key to the process. This part of the non-conformity can be considered as “justified” due to the fact that the PEFC requirement for email/letter communication of the announcement to all identified stakeholder was only introduced in PEFC ST 1001:2017 while the announcement of the TOF process took place in 2016.</p> |
| 6.3.1 The announcement and invitation shall include: | | | |
| (a) overview of the standard-setting process, | Proce dures | YES | <p>NCCF-STD-SSP-ToF</p> <p>5.3: See quotation under PEFC requirement 6.3.1</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard setting procedures require the announcement to include “overview of the standard setting process”.</p> |
| | Proce ss | NO | <p>See description of the public announcement and missing evidence under 6.3.1.</p> <p>Compliance: Minor non-conformity</p> <p>Justification:</p> |

| | | | |
|---|----------------|-----|--|
| | | | <p>The NCCF has not provided evidence on the content of the public announcement (6.3.1).</p> <p>The email communication of the announcement^[48] describes the objectives of the standard setting process.</p> |
| (b) access to the proposal for the standard (refer to 6.1), | Proce dures | YES | <p>NCCF-STD-SSP-ToF</p> <p>5.3: See quotation under PEFC requirement 6.3.1</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard setting procedures require the announcement to include “overview of the standard setting process”.</p> |
| | Proce ss | NO | <p>See description of the public announcement and missing evidence under 6.3.1.</p> <p>Compliance: Minor non-conformity - justifiable</p> <p>Justification:</p> <p>The NCCF has not provided evidence on the content of the public announcement (6.3.1).</p> <p>The email communication of the announcement^[48] describes the objectives of the standard setting process but does not reference the concept note^[9, 10] or the NCCF website with the concept note being available.</p> |
| (c) information about opportunities for stakeholders to participate in the process, | Proce dures | YES | <p>NCCF-STD-SSP-ToF</p> <p>5.3: See quotation under PEFC requirement 6.3.1</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard setting procedures require the announcement to include “information for opportunities to participate”.</p> |
| | Proce ss | NO | <p>See description of the public announcement and missing evidence under 6.3.1.</p> <p>Compliance: Minor non-conformity</p> <p>Justification:</p> <p>The NCCF has not provided evidence on the content of the public announcement (6.3.1).</p> <p>The email communication of the announcement^[48] describes the invitation to participate in the SDG. However, no other opportunities for stakeholders participation, e.g. public consultation are mentioned.</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 | Proce dures | YES | <p>NCCF-STD-SSP-ToF</p> <p>5.3: See quotation under PEFC requirement 6.3.1</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard setting procedures require the announcement to include “invitation to nominate a representative to the SDG”.</p> |

| | | | |
|--|------------|-----|---|
| stakeholders shall be made in a manner that ensures that the information reaches intended recipients and in a format that is easy to understand, | Process | NO | <p>See description of the public announcement and missing evidence under 6.3.1.</p> <p>Compliance: Minor non-conformity</p> <p>Justification:</p> <p>The NCCF has not provided evidence on the content of the public announcement (6.3.1).</p> <p>The email communication of the announcement^[48] describes the invitation to participate in the SDG.</p> |
| (e) explicit invitation and clear instruction on how to submit feedback on the scope and standard-setting process, and | Procedures | YES | <p>NCCF-STD-SSP-ToF</p> <p>5.3: See quotation under PEFC requirement 6.3.1</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard setting procedures require the announcement to include "invitation/instruction to submit feedback on the process".</p> |
| | Process | NO | <p>See description of the public announcement and missing evidence under 6.3.1.</p> <p>Compliance: Minor non-conformity</p> <p>Justification:</p> <p>The NCCF has not provided evidence on the content of the public announcement (6.3.1).</p> <p>The email communication of the announcement^[48] does not include an explicit invitation and instruction on the how to submit feedback on the suggested standard setting process.</p> |
| (f) access to the standard-setting procedures. | Procedures | YES | <p>NCCF-STD-SSP-ToF</p> <p>5.3: See quotation under PEFC requirement 6.3.1</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard setting procedures require the announcement to provide access to the standard setting procedures.</p> |
| | Process | NO | <p>See description of the public announcement and missing evidence under 6.3.1.</p> <p>Compliance: Minor non-conformity</p> <p>Justification:</p> <p>The NCCF has not provided evidence on the content of the public announcement (6.3.1).</p> <p>The email communication of the announcement^[48] describes the objectives of the standard setting process but does not reference the standard setting procedures or the NCCF website with the procedures being available.</p> <p>On the other hand, it should be noted that all critical documents relevant to the announcement of the process, such as the project proposal, EoI, standard setting procedures are currently available at NCCF's website^[12] under a section dedicated to the ToF certification.</p> |

| | | | |
|---|----------------|-----|--|
| 6.3.2 The standardising body shall review the standard-setting process based on feedback received in response to the public announcement. | Proce dures | YES | <p>NCCF-STD-SSP-ToF</p> <p>5.4: "The NCCF shall review the Standard setting process and procedures based on comments received from public announcement...".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard setting procedures satisfy the PEFC requirement.</p> |
| | Proce ss | YES | <p>The NCCF claims that it has received no comment as a result of the public announcement.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The NCCF claims has been verified during the in-country visit. No interviewed stakeholder reported that comments/feedback on the standard setting process had been sent or received (by the SDG).</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. | Proce dures | YES | <p>NCCF-STD-SSP-ToF</p> <p>5.4: "NCCF shall establish a standard development group or adjust the composition of an already existing standard development group, based on received nominations ensuring that SDG:</p> <p>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</p> <p>b) include stakeholders with expertise relevant to the subject matter of the standard, those that affected by the standard, and those that can influence implementation of the standard. The affected stakeholders shall be represented in an appropriate proportion among participants."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard setting procedures satisfy the PEFC requirement for creation of the SDG where acceptance/rejection of nominations shall be justified.</p> |
| | Proce ss | YES | <p>The NCCF provided a list of nominations received^[51] which shows that as a result of the initial announcement of the process, the NCCF received 17 nominations, none of them has been rejected. Other nominations were received and all accepted during 2016, 2017 and 2018.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The NCCF has accepted all nominations (Eol) for participation in the SDG.</p> |
| 6.4.2 The working group shall: | | | |
| (a) have balanced representation and decision-making by | Proce dures | YES | <p>NCCF-STD-SSP-ToF</p> |

| | | |
|--|----------------|--|
| <p>stakeholder categories, relevant to the subject matter and geographical scope of the standard, where no single concerned stakeholder group can dominate, nor be dominated in the process, and</p> | | <p>4.5 “The NCCF shall establish a Standard Development Group (SDG) responsible for standard-setting activities. The standard development group shall:</p> <ol style="list-style-type: none"> Be accessible to materially and directly affected stakeholders; Have balanced representation and decision-making by stakeholder categories. NCCF should take reference from the categories mentioned in the UN Agenda 21, relevant to the subject matter for balanced representation of stakeholders within the SDG in sectors of environment, economic, social (workers’ trade union, communities in and around forests, forest dwellers, tribals), certification bodies, forestry institutions, accreditation bodies and relevant government agencies where single concerned interests should not dominate nor be dominated in the process; Include stakeholders with expertise relevant to the subject matter of the standard, those that are materially affected by the standard, and those that can influence the implementation of the standard. The materially affected stakeholders shall represent a meaningful segment of the participants”. <p>Annex c, c: “With reference to the stakeholder categories identified, potential stakeholders from each of the group having the requisite qualification and related to the particular management standard sector in any manner, shall be represented in the Standard development process to achieve the objectives of the NCCF and the Document”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard setting procedures require balanced representation of the SDG. As the NCCF develops standards that are applicable to the whole India, the stakeholders on the SDG are representing the whole geographical scope of the standard.</p> |
| | <p>Process</p> | <p>NO</p> <p>The NCCF has established a Standard Development Group (SDG) that included 48 members, including its Chairman. Members of the SDG were organised amongst the following 8 stakeholder groups:</p> <ul style="list-style-type: none"> Industry and members (7), NGOs (7), Government authorities (2), State forest department (5), Research (6), Independent experts (8), Farmers (3), International stakeholders (7). <p>The membership of the SDG is shown in Annex D.</p> <p>The composition of the SDG is also described in the Development Report referring to 8 stakeholder groups defined by Agenda 21: • Government Authorities • Business and Industry • Farmers • Forestry Professionals • Non-Governmental Organizations (NGOs) • Research and Scientific Organisations • International Stakeholders • Children and Youth.</p> <p>Compliance: Minor non-conformity</p> <p>Justification:</p> <p>The SDG includes a large number of stakeholders that are organized amongst 8 stakeholder groups. The group represents</p> |

| | | | |
|---|------------|-----|--|
| | | | <p>all three pillars of the sustainable management, economic, social and environmental. It represents economic interests of industry and businesses, as well as land owners/managers (state forest department, farmers); includes research organizations and independent experts as well as professional international organizations. Civil organizations (NGOs) are mainly represented by organizations that are working in the area of sustainable development. Most of the SDG members represent organizations that are operating on the whole territory of India; some of them (state forests departments, farmers, industry) are representing specific regions of India with the interest in ToF.</p> <p>The composition of the SDG ensures that no stakeholder category can dominate or be dominated by another stakeholder category.</p> <p>The Development Report references “youth and children” as a stakeholder category although this is not reflected by the composition of the SDG. However, the interest of the “Youth and children” is also represented by other members of the SDG, in particular the Uthan Fund that focuses its work on sustainable and social development.</p> <p>The Environmental NGOs interest is mainly represented by NGOs that are primarily focused on (7) sustainable development. The NCCF invited and communicated with WWF that originally committed to participate in the process but then declined the participation following changes in responsible personnel.</p> <p>However, the minor non-conformity has been assigned based on the fact that the composition of the SDG is missing interest of “workers and trade unions”. No evidence has been submitted to demonstrate that the NCCF spent reasonable effort to include a stakeholder of this category in the SDG.</p> <p>On the other hand, it should be noted that the ToF standard and ToF management in India focuses on small holders (usually farmers) that do not employ other personnel. The interest of workers is also partially represented by the Export Council of Handicrafts that organises small producers of handicrafts.</p> <p>Observation:</p> <p>The NCCF is using slightly different classification of stakeholders (stakeholder category) in its standard setting procedures, stakeholder mapping exercise, concept note/project proposal and SDG composition. Although this difference is caused by the NCCF’s effort to adapt the stakeholders participation to TOF needs, the NCCF should, for better clarity, harmonise its approach in classification of stakeholders.</p> |
| (b) include stakeholders with expertise relevant to the subject matter of the standard, those that affected by the standard, and those that can influence implementation of the standard. The affected stakeholders shall be represented in an appropriate proportion among participants. | Procedures | YES | <p>NCCF-STD-SSP-ToF</p> <p>4.5 “The NCCF shall establish a Standard Development Group (SDG) responsible for standard-setting activities. The standard development group shall...:</p> <p>a. Be accessible to materially and directly affected stakeholders;”</p> <p>Annex C: “Have balanced representation and decision-making by stakeholder categories. NCCF should take reference from the categories mentioned in the UN Agenda 21, relevant to the subject matter for balanced representation of stakeholders within the SDG in sectors of environment, economic, social (workers’ trade union, communities in and around forests, forest dwellers, tribals), certification bodies, forestry institutions, accreditation bodies and relevant government agencies where single concerned interests should not dominate nor be dominated in the process;</p> |

| | | | |
|--|----------------|-----|---|
| | | | <p>a. Include stakeholders with expertise relevant to the subject matter of the standard, those that are materially affected by the standard, and those that can influence the implementation of the standard. The materially affected stakeholders shall represent a meaningful segment of the participants”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard setting procedures require that the composition of the SDG shall have sufficientprovide technical expertise and the SDG shall include an appropriate proportion of stakeholders in the subject matter and that are stakeholders affected by the standard and can influenceinfluencing implementation of the standard. shall represent an appropriate proportion of the SDG.</p> |
| | Proce ss | YES | <p>See description of the SDG composition under 6.4.2a.</p> <p>25 members can influence the implementation or are directly affected by the standard (industry, state forest departments, farmers, independent experts and consultants).</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>All members of the SDG have vast expertise and knowledge in their respective field. Significant proportion of the SDG membership is represented by scientific and research institutions and technical experts / consultants with experience in ToF management. The SDG also involved international stakeholders with knowledge and experiences from outside India.</p> |
| <p>6.4.3 In order to achieve balanced representation, the standardising body shall strive to have all identified stakeholder groups (refer to 6.2) represented. The standardising body shall set targets for the participation of key stakeholders and proactively seek their participation by using outreach such as (but not limited to) personal emails, phone calls, meeting invitations etc.</p> <p>NOTE When a stakeholder group is not represented and key stakeholders cannot be encouraged to participate, the standardising body may consider alternative options.</p> | Proce dures | YES | <p>NCCF-STD-SSP-ToF</p> <p>5.5: “In order to achieve balanced representation, the NCCF shall strive to have all identified stakeholder groups represented. The NCCF shall set targets for the participation of key stakeholders and proactively seek their participation by using outreach such as (but not limited to) personal emails, phone calls, meeting invitations etc.</p> <p>Note: When a stakeholder group is not represented and key stakeholders cannot be encouraged to participate, the standardizing body may consider alternative options.”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The procedures require a proactive approach to achieve planed balanced representation in the working group (SDG).</p> |
| | Proce ss | YES | <p>See description of the SDG composition under PEFC requirement 6.4.2a.</p> <p>The SDG includes a large number of stakeholders that are organized amongst 8 stakeholder groups. The group represents all three pillars of the sustainable management, economic, social and environmental. It represents economic interests of industry and businesses, as well as land owners/managers (state forest department, farmers); includes research organizations and independent experts as well as professional international organizations. Civil organizations (NGOs) are mainly represented by organizations that are working in the area of sustainable development.</p> <p>However, the composition of the SDG is missing interest of workers and trade unions that has been identified as a stakeholder</p> |

| | | | |
|---|----------------|-----|--|
| | | | <p>category following references to UN Agenda 21, in the concept note^[9] and is also referenced in the Development Report.</p> <p>The NCCF has not provided evidence on active measures taken to ensure participation of those stakeholder groups in the SDG.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The SDG includes representation for all envisaged stakeholder categories.</p> <p>The assessment took into consideration the fact that the PEFC requirement is only included in the latest edition of PEFC ST 1001:2017 and was not effective at the time when the NCCF conducted the stage of creating the SDG (2016).</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, | Proce dures | YES | <p>NCCF-STD-SSP-ToF</p> <p>5.6: "The work of the standard development group shall be organized in an open and transparent manner where:</p> <ol style="list-style-type: none"> Working drafts shall be made available to all members of the Standard development group..." All members of the standard development group shall be provided with meaningful opportunities to contribute to the development or revision of the standard and submit comments to the working drafts Comments and views submitted by any member of the standard development group shall be considered in an open and transparent way and their resolution and proposed changes shall be recorded". <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard setting procedures satisfy the PEFC requirement.</p> |
| | Proce ss | YES | <p>During the standard setting / revision process, the SDG met 4 times (for complete list of meetings and their agenda, see the Development Report):</p> <ul style="list-style-type: none"> - 7 April 2017^[15], - 5 August 2017, - 17 March 2018, - 16 February 2019^[16]. <p>The assessment verified records relating to a sample of meetings (7 April 2017 and 16 February 2019).</p> <p>For all verified meetings, the NCCF secretariat distributed a written invitation (e-mail)^[17] that included an agenda,^[18-19] draft standard or their parts, and other supporting documentation.</p> <p>The work of the SDG was supported by the Technical Working Group (TWG) that was responsible for preparation of the draft documents and analysis of the comments and suggestions of the SDG members.</p> <p>In between 2 July 2016 and 12 January 2019, the TWG met 17 times. The assessment verified supporting documentation for two TWG meetings held on 25 August 2016 (TWG ToF IV) and on 12</p> |

| | | | |
|--|----------------|-----|---|
| | | | <p>January 2019 (TWG ToF XVII). For both meetings, the NCCF prepared an agenda document that was also used as minutes of the meeting^[23-27].</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>Prior to meetings, the members of the SDG received a written invitation (e-mail) to the meetings with an agenda and latest drafts of the standard. and other supporting documentation.</p> <p>Similarly, the NCCF Secretariat also provided support to the TWG meetings concerning invitation, preparation of agenda, keeping minutes and their distribution to TWG members.</p> |
| (b) all members of the working group shall be given meaningful opportunities to contribute to the development or revision of the standard and to provide feedback on working drafts, and | Proce dures | YES | <p>NCCF-STD-SSP-ToF</p> <p>5.6: "The work of the standard development group shall be organized in an open and transparent manner where:...</p> <p>b. All members of the standard development group shall be provided with meaningful opportunities to contribute to the development or revision of the standard and submit comments to the working drafts..."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard setting procedures satisfy the PEFC requirement.</p> |
| | Proce ss | YES | <p>The SDG met 4 times in in-person meetings (see also 6.4.4a). The minutes of the meetings^[15-16] show that the SDG discussed all elements of the standard with general intention to achieve a consensus amongst stakeholders.</p> <ul style="list-style-type: none"> - The Forum met 4 times during the period April 2017 and February 2019. - The meetings were well organised with clearly written and communicated agenda for each meeting. - The meetings were well attended by members of the SDG. The SDG members were also provided with an opportunity to participate via videoconference. - The SDG meetings provided sufficient time for discussion. - The SDG meetings were supported by the analysis and drafting work of the TWG that met 17 times during the standard setting process. <p>Compliance: Conformity</p> <p>Justification:</p> <p>The SDG and TWG meetings were well organized and provided members with opportunities for meaningful contributions. The SDG was supported by the NCCF's Secretariat that was responsible for the meetings administrative support and by the TWG that was responsible for preparing draft documents and analysing SDG members comments and suggestions.</p> |
| (c) feedback and views given by any member of the working group shall | Proce dures | YES | <p>NCCF-STD-SSP-ToF</p> <p>5.6: "The work of the standard development group shall be organized in an open and transparent manner where:...</p> |

| | | | |
|---|------------|-----|--|
| be considered in an open and transparent way where the outcome of these considerations is recorded. | | | <p>c. Comments and views submitted by any member of the standard development group shall be considered in an open and transparent way and their resolution and proposed changes shall be recorded”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard setting procedures satisfy the PEFC requirement.</p> |
| | Process | YES | <p>The minutes of the SDG meetings^[15, 16] provide evidence of the openness and consideration of comments raised by the SDG members.</p> <p>The minutes of the meetings have been kept and distributed to the SDG members shortly after the meetings^[21-22] together with draft documents. The agenda for each meeting also included approval of minutes from the last meeting^[15, 16] as well as draft documents.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The SDG meetings were well organized, their results were recorded and communicated to the members of the SDG.</p> |
| <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:</p> | | | |
| (a) face-to face meeting(s) where there is a verbal yes/no vote, a show of hands for a yes/no vote; a statement on consensus from the Chair when there are no dissenting voices or hands (votes); a formal ballot, etc., | Procedures | YES | <p>NCCF-STD-SSP-ToF</p> <p>5.10: “The decision of the Standard Development Group to recommend the final draft for formal approval to the NCCF Governing Body shall be taken on the basis of a consensus. In case of any opposition the following processes can be used by the standard development group to reach an accord:</p> <ol style="list-style-type: none"> A face-to face meeting where there is a verbal yes/no vote, show of hands for a yes/no vote; a statement on consensus from the Chair where there are no dissenting voices or hands (votes); a formal balloting process, etc. A telephone conference meeting where there is a verbal yes/no vote An e-mail meeting where a request for agreement or objection is provided to members with the members providing a written response (a proxy for a vote), or Combinations of the a. to c. thereof”. <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard setting procedures satisfy the requirement.</p> |
| | Process | YES | <p>The SDG built consensus on the draft ToF standard at its fourth meeting^[16]. Further it was agreed that the SDG members would be given 2 weeks’ time from the day of circulation of the revised NCCF-TOF Final Draft Certification Standard (v1.2) incorporating all the proposed changes^[28]. Comments and suggestions during these 2 weeks were recorded and incorporated appropriately in the standard^[29].</p> <p>Taking into consideration the perspective of Ministry of Agriculture and Farmer Welfare (MoA) of India, the NCCF’s Governing Body provided an extension for the consensus building to address the</p> |

| | | | |
|--|------------|-----|--|
| | | | <p>comments of the MoA and response from States. The extension was for a period of 6 weeks, including 4 weeks for offering comments and 2 weeks for review of comments and finalization of draft of the ToF Standard.</p> <p>Subsequently, MoA provided the NCCF with the comments from four agroforestry implementing states i.e. Karnataka, Odisha, Punjab and Uttar Pradesh. This took considerable time (April-July 2019). All the relevant suggestions and comments of MoA and of the States were incorporated and the revised draft version (v1.3) was subsequently circulated to SDG members^[30].</p> <p>Neither the minutes of the SDG meeting^[16] nor other reviewed documentation indicates that any member of the SDG voted against the standard or raised sustained opposition against the standard.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The SDG's decision was made through combination of methods (see 6.4.5c, d) and the SDG reached consensus amongst its members.</p> |
| (b) telephone conference meeting(s) where there is a verbal yes/no vote, | Procedures | YES | <p>NCCF-STD-SSP-ToF</p> <p>5.10: "The decision of the Standard Development Group to recommend the final draft for formal approval to the NCCF Governing Body shall be taken on the basis of a consensus. In case of any opposition the following processes can be used by the standard development group to reach an accord:</p> <ol style="list-style-type: none"> A face-to face meeting where there is a verbal yes/no vote, show of hands for a yes/no vote; a statement on consensus from the Chair where there are no dissenting voices or hands (votes); a formal balloting process, etc. A telephone conference meeting where there is a verbal yes/no vote An e-mail meeting where a request for agreement or objection is provided to members with the members providing a written response (a proxy for a vote), or Combinations of a. to c. thereof". <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard setting procedures satisfy the requirement.</p> |
| | Process | N/A | <p>Compliance: Not applicable</p> <p>Justification:</p> <p>The Forum's decision was made through combination of methods (see 6.4.5 a, c, d).</p> |
| (c) e-mail request to the working group for agreement or objection where the members provide a formal (written) response (vote), | Procedures | YES | <p>NCCF-STD-SSP-ToF</p> <p>5.10: "The decision of the Standard Development Group to recommend the final draft for formal approval to the NCCF Governing Body shall be taken on the basis of a consensus. In case of any opposition the following processes can be used by the standard development group to reach an accord:</p> <ol style="list-style-type: none"> A face-to face meeting where there is a verbal yes/no vote, show of hands for a yes/no vote; a statement on |

| | | | |
|--|------------|-----|---|
| | | | <p>consensus from the Chair where there are no dissenting voices or hands (votes); a formal balloting process, etc.</p> <p>b. A telephone conference meeting where there is a verbal yes/no vote</p> <p>c. An e-mail meeting where a request for agreement or objection is provided to members with the members providing a written response (a proxy for a vote), or</p> <p>d. Combinations of a. to c. thereof".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard setting procedures satisfy the requirement.</p> |
| | Process | YES | <p>See description under 6.4.5a.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The SDG's decision was made through combination of methods (see 6.4.5 a, c, d).</p> |
| (d) combinations of these methods. | Procedures | YES | <p>NCCF-STD-SSP-ToF</p> <p>5.10: "The decision of the Standard Development Group to recommend the final draft for formal approval to the NCCF Governing Body shall be taken on the basis of a consensus. In case of any opposition the following processes can be used by the standard development group to reach an accord:</p> <p>e. A face-to face meeting where there is a verbal yes/no vote, show of hands for a yes/no vote; a statement on consensus from the Chair where there are no dissenting voices or hands (votes); a formal balloting process, etc.</p> <p>f. A telephone conference meeting where there is a verbal yes/no vote</p> <p>g. An e-mail meeting where a request for agreement or objection is provided to members with the members providing a written response (a proxy for a vote), or</p> <p>a. Combinations of a. to c. thereof".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard setting procedures satisfy the requirement.</p> |
| | Process | YES | <p>See description under 6.4.5a.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Forum's decision was made through combination of voting at the face-to face meeting and a postal ballot method (see 6.4.5 a, c, d).</p> |
| 6.4.6 Where a vote is used in decision-making, the standard-setting procedures shall determine and include | Procedures | YES | <p>NCCF-STD-SSP-ToF</p> <p>"5.11 Where a vote is used in decision-making, decision-making process shall be consensus based wherein majority vote shall not override sustained opposition in order to achieve consensus."</p> |

| | | | |
|---|------------|-----|--|
| 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. | | | Compliance: Conformity Justification: <p>The standard setting procedures allows voting within the SDG group to make decision on the final draft standard to be formally approved by the NCCF and defines that the majority vote shall not override sustain opposition in order to achieve consensus.</p> <p>This wording delivers the objective of the PEFC requirement although the procedures do not specify an exact threshold for decision-making.</p> |
| | Process | YES | <p>See description of 6.4.5a.</p> Compliance: Conformity Justification: <p>The minutes of the fourth SDG meeting^[16] indicate unanimity of the SDG decision.</p> |
| 6.4.7 When there is sustained opposition to a substantial issue, the issue shall be resolved using the following methods: | | | |
| (a) finding a compromise through discussion and negotiation on the disputed issue within the working group, | Procedures | YES | NCCF-STD-SSP-ToF <p>5.12 In the case of a negative vote which represents sustained opposition to any important part of the concerned interests, surrounding a substantive issue, the issue shall be resolved using the following mechanism(s):</p> <p>a. Discussion and negotiation on the disputed issue within the standard development group in order to find a compromise</p> <p>b. Direct negotiation between the stakeholder(s) submitting the objection and stakeholders with different views on the disputed issue in order to find a compromise</p> <p>c. additional round(s) of public consultation (if necessary) where further stakeholder input can help to achieve consensus on unresolved issues. NCCF shall determine the scope and duration of any additional public consultation”.</p> Compliance: Conformity Justification: <p>The procedures require that any negative vote of any SDG member representing sustained opposition requires measures to be taken to resolve the opposition. Those measures are identical with the PEFC requirement.</p> |
| | Process | N/A | <p>See description of 6.4.5a.</p> Compliance: Not applicable Justification: <p>The minutes of the fourth SDG meeting^[16] indicate unanimity of the SDG decision.</p> |
| (b) finding a compromise through direct negotiation | Procedures | YES | NCCF-STD-SSP-ToF <p>5.12 In the case of a negative vote which represents sustained opposition to any important part of the concerned interests,</p> |

| | | | |
|---|------------|-----|--|
| between the stakeholder(s) making the objection and other stakeholders with different views on the disputed issue, | | | <p>surrounding a substantive issue, the issue shall be resolved using the following mechanism(s):</p> <p>a. Discussion and negotiation on the disputed issue within the standard development group in order to find a compromise</p> <p>b. Direct negotiation between the stakeholder(s) submitting the objection and stakeholders with different views on the disputed issue in order to find a compromise</p> <p>c. additional round(s) of public consultation (if necessary) where further stakeholder input can help to achieve consensus on unresolved issues. NCCF shall determine the scope and duration of any additional public consultation”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The procedures require that any negative vote of any SDG member representing sustained opposition requires measures to be taken to resolve the opposition. Those measures are identical with the PEFC requirement.</p> |
| | Process | N/A | <p>See description of 6.4.5a.</p> <p>Compliance: Not applicable</p> <p>Justification:</p> <p>The minutes of the fourth SDG meeting^[16] indicate unanimity of the SDG decision.</p> |
| (c) additional round(s) of public consultation (if necessary) where further stakeholder input can help to achieve consensus on unresolved issues. The standardising body determines the scope and duration of any additional public consultation. | Procedures | YES | <p>NCCF-STD-SSP-ToF</p> <p>5.12 In the case of a negative vote which represents sustained opposition to any important part of the concerned interests, surrounding a substantive issue, the issue shall be resolved using the following mechanism(s):</p> <p>a. Discussion and negotiation on the disputed issue within the standard development group in order to find a compromise</p> <p>b. Direct negotiation between the stakeholder(s) submitting the objection and stakeholders with different views on the disputed issue in order to find a compromise</p> <p>c. Additional round(s) of public consultation (if necessary) where further stakeholder input can help to achieve consensus on unresolved issues. NCCF shall determine the scope and duration of any additional public consultation”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The procedures that any negative vote of any SDG member representing sustained opposition requires measures to be taken to resolve the opposition. Those measures are identical with the PEFC requirement.</p> |
| | Process | N/A | <p>See description of 6.4.5a.</p> <p>Compliance: Not applicable</p> <p>Justification:</p> <p>The minutes of the fourth SDG meeting^[16] indicate unanimity of the SDG decision.</p> |

| | | | |
|---|----------------|-----|---|
| 6.4.8 When a substantial issue cannot be resolved and sustained opposition persists, the standardising body shall initiate dispute resolution in accordance with its procedures for impartial and objective action. | Proce dures | YES | <p>NCCF-STD-SSP-ToF</p> <p>5.13 “When a substantial issue cannot be resolved and sustained opposition persists, NCCF shall initiate dispute resolution in accordance with its procedures for impartial and objective action.”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The procedures require that a formal dispute settlement process is used when the sustained opposition cannot be resolved by specific measures.</p> |
| | Proce ss | N/A | <p>See description of 6.4.5a.</p> <p>Compliance: Not applicable</p> <p>Justification:</p> <p>The minutes of the fourth SDG meeting^[16] indicate unanimity of the SDG decision.</p> |
| 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, NOTE <i>In a timely manner</i> means (at the latest) the day before the start of public consultation. | Proce dures | YES | <p>NCCF-STD-SSP-ToF</p> <p>5.7: “The NCCF shall organize a public consultation on the draft standard and shall ensure that:</p> <ul style="list-style-type: none"> a. The start and the end of the public consultation is announced in a timely manner in suitable media, at least the day before the start of public consultation b. The invitation of key and disadvantaged stakeholders shall be made by means that ensure that the information reaches its recipient and is understandable c. The draft standard shall be made publicly available and accessible d. The public consultation is for at least 60 days e. Direct invitation to mapped stakeholders, SDG members and any other stakeholder(s) will be sent for inviting comment(s) on the enquiry draft f. All comments received are considered by the standard development group in an objective manner g. A synopsis of received comments compiled from material issues, including the results of their consideration, is publicly available on the website.”. <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard setting procedures require the start and end of the public consultation to be announced in a timely manner *at least the day before the start through suitable media</p> |
| | Proce ss | YES | <p>The NCCF organised public consultation on the ToF standard in the period starting from 25 April 2018 until 24 June 2018.</p> <p>The public consultation has been announced at the NCCF’s website on 24 April 2018^[31].</p> <p>The NCCF communicated the start of the public consultation by direct e-mails using a “chimplmail” application to 142 recipients. Also, direct emails were sent to the NCCF’s stakeholders^[32, 52].</p> |

| | | | |
|--|----------------|-----|---|
| | | | <p>The public consultation was also supported by two regional workshops:</p> <ul style="list-style-type: none"> a) Arid Forest Research Institute, Jodhpur, Rajasthan on 12 May 2018; b) Central Agroforestry Research Institute, Jhansi on 16 May 2018. <p>Compliance: Conformity</p> <p>Justification:</p> <p>The NCCF has launched the public consultation on the draft ToF standard on 24 April 2018 at its website and communicated it by direct mailing to its stakeholders. In addition, the NCCF organized two regional seminars dedicated to ToF and supporting the public consultation.</p> |
| (b) a direct invitation to comment on the enquiry draft is sent to each stakeholder identified by stakeholder identification mapping (refer to 6.2) aiming for a balanced participation of stakeholder groups, | Proce dures | YES | <p>NCCF-STD-SSP-ToF</p> <p>5.7: "The NCCF shall organize a public consultation on the draft standard and shall ensure that:</p> <ul style="list-style-type: none"> b. The invitation of key and disadvantaged stakeholders shall be made by means that ensure that the information reaches its recipient and is understandable e. Direct invitation to mapped stakeholders, SDG members and any other stakeholder(s) will be sent for inviting comment(s) on the enquiry draft..." <p>Compliance: Conformity</p> <p>Justification:</p> <p>The wording the standard setting procedures requires direct invitation to all mapped stakeholders.</p> |
| | Proce ss | YES | <p>The NCCF communicated the start of the public consultation by direct e-mails using a "chimplmail" application to 142 recipients. Also, direct emails were sent to the NCCF's stakeholders^[52]. The NCCF also sent a reminder email to its stakeholders^[32].</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The NCCF was using direct mailing to inform its stakeholders about the public consultation.</p> |
| (c) invitations are sent to disadvantaged and key stakeholders by methods that ensure they reach recipients and are easy to understand, | Proce dures | YES | <p>NCCF-STD-SSP-ToF</p> <p>5.7: "The NCCF shall organize a public consultation on the draft standard and shall ensure that:</p> <ul style="list-style-type: none"> c. The invitation of key and disadvantaged stakeholders shall be made by means that ensure that the information reaches its recipient and is understandable f. Direct invitation to mapped stakeholders, SDG members and any other stakeholder(s) will be sent for inviting comment(s) on the enquiry draft..." <p>Compliance: Conformity</p> <p>Justification:</p> <p>The wording the standard setting procedures requires direct invitation to key and disadvantage stakeholders.</p> |
| | Proce ss | YES | <p>The NCCF communicated the start of the public consultation by direct e-mails using a "chimplmail" application to 142 recipients.</p> |

| | | | |
|---|----------------|-----|--|
| | | | <p>Also, direct emails were sent to the NCCF's stakeholders^[52]. The NCCF also sent a reminder email to its stakeholders^[32]. This mailing also covered all relevant stakeholders, including those considered as key or disadvantaged.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The NCCF was using direct mailing to inform its stakeholders about the public consultation.</p> |
| (d) the enquiry draft is made publicly available, | Proce dures | YES | <p>NCCF-STD-SSP-ToF</p> <p>5.7: "The NCCF shall organize a public consultation on the draft standard and shall ensure that:</p> <p>c. The draft standard shall be made publicly available and accessible".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard setting procedures satisfy the PEFC requirement.</p> |
| | Proce ss | YES | <p>The NCCF organised public consultation on the ToF standard in the period starting from 25 April 2018 until 24 June 2018.</p> <p>The public consultation has been announced at the NCCF's website on 24 April 2018^[31] and it includes the draft standard as well as instructions for making comments and a comment table.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The enquiry draft was publicly available.</p> |
| (e) public consultation is for at least 60 days, | Proce dures | YES | <p>NCCF-STD-SSP-ToF</p> <p>5.7: "The NCCF shall organize a public consultation on the draft standard and shall ensure that:</p> <p>d. The public consultation is for at least 60 days".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard setting procedures satisfy the PEFC requirement.</p> |
| | Proce ss | YES | <p>The NCCF organised public consultation on the ToF standard in the period starting from 25 April 2018 until 24 June 2018.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The public consultation lasted 60 days.</p> |
| (f) all feedback is considered by the working group in an objective manner, and | Proce dures | YES | <p>NCCF-STD-SSP-ToF</p> <p>5.7: "The NCCF shall organize a public consultation on the draft standard and shall ensure that:</p> <p>f. All comments received are considered by the standard development group in an objective manner...".</p> <p>Compliance: Conformity</p> |

| | | | |
|---|----------------|-----|---|
| | | | Justification: The standard setting procedures satisfy the PEFC requirement. |
| | Proce ss | YES | The NCCF received 84 comments ^[35] from the public consultation that were considered by the TWG on 20-21 July 2018 ^[33,34,35,53] and then by the SDG on 19 February 2019 ^[54] . Compliance: Conformity Justification: The comments from the public consultation (84) were considered by the TWG ^[33,34,35, 53] and the SDG ^[54] . |
| (g) a synopsis of feedback is compiled for each material issue, including the outcome of considering the issue. The synopsis is made publicly available (e.g. on a website) and is sent to each stakeholder/party that gave feedback. NOTE For clarity the standardising body's synopsis may aggregate responses on material issues where there was similar feedback from different stakeholders. However, best practice would be to publish each piece of original feedback and the response, to allow each stakeholder to identify its own feedback. | Proce dures | YES | NCCF-STD-SSP-ToF 5.7: "The NCCF shall organize a public consultation on the draft standard and shall ensure that: g. A synopsis of received comments compiled from material issues, including the results of their consideration, is publicly available on the website." Compliance: Conformity Justification: The standard setting procedures satisfy the PEFC requirement. |
| | Proce ss | YES | The table with all received comments, including outcomes of their consideration ^[35] , was published at the NCCF website ^[36] . Compliance: Conformity Justification: The result of comments consideration was made publicly available by publishing a table with all comments and results of their consideration ^[35,36] . |
| 6.5.2 For new standards the standardising body shall organise a second round of public consultation lasting at least 30 days. | Proce dures | YES | NCCF-STD-SSP-ToF 5.7: "For new standards, a second round of public consultation lasting at least 30 days shall also be organized." Compliance: Conformity Justification: The standard setting procedures require to organise a second public consultation for a new standard. |
| | Proce ss | NO | The NCCF has not conducted the second public consultation. However, after the completion of the first public consultation in 2018, the NCCF conducted additional consultation activities: a) Consultation with the governmental bodies; b) Stakeholders consultation as a part of the pilot testing. Ad a) NCCF sought advice and opinions from the Ministry of Agriculture and Farmer Welfare (MoA&FW) that further circulated the NCCF Draft ToF Standard to all the states across India to seek their inputs ^[55] . |

| | | | |
|---|----------------|-----|---|
| | | | <p>Compliance: Minor non-conformity</p> <p>Justification:</p> <p>The NCCF has not organised the second public consultation.</p> <p>It should be noted that the NCCF has started planning the process before the publication of PEFC ST 1001:2017 that introduced the requirement of the second public consultation. However, the public consultation took place after PEFC ST 1001:2017 was published and should have reviewed its process accordingly.</p> <p>Although the NCCF has not conducted the second public consultation, it carried out additional direct consultation with government (Ministry of Agriculture and Farmer Welfare - MoA&FW) and stakeholders consultation as a part of pilot testing. Those pr</p> |
| <p>6.6 The standardising body shall organise pilot testing of new standard(s) to assess the clarity, auditability and feasibility of the requirements. The working group shall consider the outcome of pilot testing.</p> <p>NOTE Pilot testing is not required for revision of an existing standard when experience from its usage can substitute for pilot testing.</p> | Proce dures | YES | <p>NCCF-STD-SSP-ToF</p> <p>5.9: "The NCCF shall organize pilot testing of the new standards and the results of the pilot testing shall be considered by the standard development group, or its constituted working group/ committee.</p> <p>Note: Pilot testing is not required in case of revision of a standard where experience from its usage can substitute for pilot testing".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard setting procedures satisfy the PEFC requirement.</p> |
| | Proce ss | YES | <p>The NCCF has organised pilot testing in the field in four different sites across India^[37, 38-44] in September and October 2018.</p> <p>In Rajasthan, the pilot testing was conducted in Bikaner Forest Division where plantations form a part of the long stretch along the Indira Gandhi Canal. The timber harvesting in this area has recently begun are a source for raw material for the handicraft industries of Jodhpur, Jaipur and other parts of Rajasthan. Along with these plantations there are also nearby farmers who grow trees and supply wood to these industries.</p> <p>The second pilot testing took place in the catchment areas of Tamil Nadu Newsprint and Paper Limited (TNPL) are the source of raw material for the organisation. The proposed piloting was conducted on the three different sites: covering (i) Farm Forestry; (ii) Captive Plantations and (iii) Group certification/cooperatives.</p> <p>The third pilot testing took place in Saharanpur, Uttar Pradesh, the areas around Star Paper Mills Ltd. are the source of raw material for the mill. The organisation has developed its catchment in collaboration with farmers and has been working closely with them.</p> <p>The fourth are is located close to New Delhi, the capital city of India owns forests and tree cover represents substantial areas as avenue plantations, roadside plantations, and much more which are owned by Forest Department, Delhi Development Authority, Delhi Municipal Corporations, Horticulture Department etc. These urban greens have important environmental role like pollution control, shade, beautification, sound regulation, biodiversity, etc.</p> <p>An expression of interest (EoI)^[37] was published at the NCCF's website in August 2018 inviting the potential stakeholders to participate in the process in capacity of observers and auditors^[37].</p> |

| | | | |
|--|----------------|-----|---|
| | | | <p>The NCCF selected experienced assessors with auditing experience to conduct the pilot testing.</p> <p>The pilot testing resulted in detailed summary reports that were further supported by full Checklists^[38-44].</p> <p>After the pilot testing, the TWG met in January 2019 to discuss and consider the findings of the pilot testing and incorporate the outcomes into the ToF Standard. The TWG consideration was confirmed by the SDG meeting on 12 February 2019.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The NCCF organized the pilot testing and outcomes of the pilot testing were considered by the TWG and SDG and incorporated into a new version of the standard.</p> |
| Approval and Publication | | | |
| 7.1 The standardising body shall approve the standard(s)/normative document(s) formally when there is evidence of consensus among the working group. | Proce dures | YES | <p>NCCF-STD-SSP-ToF</p> <p>6.1 “The NCCF Governing Body shall formally approve the standards based on evidence of consensus reached by the standard development group. All standards shall be approved by the Governing Body of NCCF”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard setting procedures satisfy the PEFC requirement.</p> |
| | Proce ss | YES | <p>Final Draft Standard for Trees Outside Forest (ToF) Version (v1.3) NCCF-STD-TOF-1.3/2019 was submitted to members of the Governing Body on 06 August 2019 for their approval. The document was approved by the Governing Body on 10th August 2019, in the 16th Governing Body Meeting of NCCF^[45].</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard was formally approved.</p> |
| 7.2.1 The formally approved standard(s)/normative document(s) shall be published and made publicly available at no cost within 14 days of approval, or as otherwise defined by the standardising body. | Proce dures | YES | <p>NCCF-STD-SSP-ToF</p> <p>6.3 “The formally approved standards/normative documents shall be published in a timely manner and made publicly available on website of NCCF within 14 days of approval or as otherwise advised by the Governing Body in case of any changes suggested in the standard”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard setting procedures requires to publish the standard within 14 day of the formal approval that satisfies the PEFC requirement for “as otherwise defined by the standardisation body”.</p> |
| | Proce ss | YES | <p>The NCCF published the ToF standard at its website^[46]. The standard was published within 14 days of the formal approval.</p> <p>Compliance: Conformity</p> |

| | | | |
|--|------------|-----|--|
| | | | Justification: The NCCF published the ToF standard at its website ^[46] . |
| 7.2.2 Standard(s) shall include: | | | |
| (a) identification and contact information for the standardising body, | Procedures | YES | NCCF-STD-SSP-ToF 6.2: "Standard(s) shall include: a) identification and contact information for the standardizing body, b) official language of the standard, c) The approval date and the date of next periodic review" Note: The date of next periodic review may be within a shorter period than five years based on stakeholder expectations or other foreseen developments. Compliance: Conformity Justification: The procedures satisfy the PEFC requirement. |
| | Process | YES | NCCF-STD-ToF The standard identifies at the front page the NCCF as the standardisation body and provides its contact details. Compliance: Conformity Justification: The standard identifies at the front page the NCCF as the standardisation body and provides its contact details. |
| (b) official language of the standard, | Procedures | YES | NCCF-STD-SSP-ToF 6.2: "Standard(s) shall include: a) identification and contact information for the standardizing body, b) official language of the standard, c) The approval date and the date of next periodic review" Note: The date of next periodic review may be within a shorter period than five years based on stakeholder expectations or other foreseen developments. Compliance: Conformity Justification: The procedures satisfy the PEFC requirement. |
| | Process | YES | NCCF-STD-ToF The standard identifies in the "Copyright notice" that the English is the only official language of the standard. Compliance: Conformity Justification: The standard identifies in the "Copyright notice" that the English is the only official language of the standard. |

| | | | |
|--|----------------|-----|--|
| (c) a note that when there is inconsistency between versions, the English version of the standard as endorsed by the PEFC Council is the reference. | Proce dures | N/A | Compliance: Not applicable Justification: The NCCF develops its standard in English and it is not expected that they would be translated into other languages. |
| | Proce ss | YES | NCCF-STD-ToF The standard identifies in the “Copyright notice” that the English is the only official language of the standard. Compliance: Conformity Justification: The standard identifies in the “Copyright notice” that the English is the only official language of the standard. |
| (d) The approval date and the date of next periodic review NOTE The date of next periodic review may be within a shorter period than five years based on (for example) stakeholder expectations or other foreseen developments. | Proce dures | YES | NCCF-STD-SSP-ToF 6.2: “Standard(s) shall include: a) identification and contact information for the standardizing body, b) official language of the standard, c) The approval date and the date of next periodic review” Note: The date of next periodic review may be within a shorter period than five years based on stakeholder expectations or other foreseen developments. Compliance: Conformity Justification: The procedures satisfy the PEFC requirement. |
| | Proce ss | NO | NCCF-STD-ToF The standard includes in the second page: “Date of approval: 20 May 2022” (This date was changed after changes have been made in May 2022. The original date was 10 August 2019). “Date of review: 19 May 2027” Compliance: Minor non-conformity The standard identifies the approval date and the review date. The review date is five years from the approval. However, the approval date of 20 May 2022 relates to the approval of changes related to the PEFC assessment process and non-conformities identified in the draft interim report. Although not explicitly specified by the PEFC documentation, the “review date” should follow the approval date of the initial edition of the standard or approval date of the periodic revision. |
| 7.2.3 Printed copies shall be made available upon request at a price that covers no more than administrative costs (if any) | Proce dures | YES | NCCF-STD-SSP-ToF 6.4: “Printed copies shall be made available upon request. If priced, shall only be covering the administrative costs”. Compliance: Conformity Justification: The standard setting procedures satisfies the PEFC requirement. |

| | | | |
|--|------------|-----|---|
| | Process | YES | <p>The assessor has not received any information that would indicate that the applicant has rejected to provide a printed copy of the ToF standard.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The applicant satisfies the requirement.</p> |
| 7.2.4 The standardising body shall make the development report (refer to PEFC GD 1007) publicly available | Procedures | YES | <p>NCCF-STD-SSP-ToF</p> <p>6.5: "NCCF shall prepare a development report after completion of standard development process and shall make it publicly available".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard setting procedures require to develop a development report and make it publicly available.</p> |
| | Process | YES | <p>The NCCF published a comprehensive and detailed Development report at its website^[47].</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The applicant made the Development report publicly available. Its content satisfies PEFC GD 1007^[47].</p> |
| Periodic review of standards | | | |
| 8.1 The standard(s)/normative document(s) shall be reviewed at intervals that do not exceed a five-year period. The review shall be based on consideration of feedback received during the standard's implementation and a gap analysis. If necessary, a stakeholder consultation shall be organised to obtain further feedback and input. | Procedures | YES | <p>NCCF-STD-SSP-ToF</p> <p>7: "Standard(s) shall be reviewed at intervals that do not exceed a five-year period. The review shall be based on consideration of feedback received during the standard's implementation and a gap analysis. If necessary, a stakeholder consultation shall be organized to obtain further feedback and input."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard setting procedures require the standard to be reviewed and revised at five years intervals with consideration of feedback on implementation and gap analysis.</p> |
| | Process | N/A | <p>The process resulted in a first edition of the ToF standard.</p> <p>Compliance: Not applicable</p> <p>Justification:</p> <p>The process resulted in a first edition of the ToF standard. The NCCF approved the previous version of the standard.</p> |
| 8.2.1 The standardising body shall establish and maintain a permanent mechanism for collecting and recording feedback on a standard. This | Procedures | YES | <p>NCCF-STD-SSP-ToF</p> <p>7.1.1: "NCCF shall establish and maintain a permanent mechanism for collecting and recording feedback on standard. This mechanism shall be accessible on the website of NCCF and/or PEFC National Governing Body with clear directions for providing feedback".</p> |

| | | | |
|---|------------|-----|--|
| <p>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> | | | <p>Compliance: Conformity</p> <p>Justification:</p> <p>The procedures are identical with the PEFC requirement.</p> |
| | Process | YES | <p>The NCCF published at its website a statement:</p> <p>"In case of any feedback/query/interest/complaint, please contact tof.mail@nccf.in".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The NCCF has published a simple statement inviting stakeholders to provide feedback, query, complaint, etc.</p> <p>This statement itself does not guarantee a clear feedback mechanism, including mechanism for consideration and recording of the feedback and queries. The conformity statement is based on the fact that the ToF standard has not yet been PEFC endorsed and implemented and the NCCF has still time to develop the full feedback mechanism.</p> |
| <p>8.2.2 All feedback received through all channels, including meetings, training courses, etc. shall be recorded and considered.</p> | Procedures | YES | <p>NCCF-STD-SSP-ToF</p> <p>7.1.2: "All feedback received through all channels, including meetings, training courses, etc. shall be recorded and considered".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The procedures are identical with the PEFC requirement.</p> |
| | Process | N/A | <p>The process resulted in a first edition of the ToF standard.</p> <p>Compliance: Not applicable</p> <p>Justification:</p> <p>The process resulted in a first edition of the ToF standard. The ToF standard has not yet been implemented and the NCCF has not received any feedback, query related to the implementation of the standard.</p> |
| <p>8.3.1 At the start of a review, the standardising body shall evaluate the standard against appropriate PEFC International standards, national laws and regulations, and other relevant standards to identify potential gaps in the standard.</p> | Procedures | YES | <p>NCCF-STD-SSP-ToF</p> <p>7.2.1: "At the start of a review, NCCF shall evaluate the standard against appropriate PEFC International standards, national laws and regulations, and other relevant standards to identify potential gaps in the standard".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The procedures are identical with the PEFC requirement.</p> |
| | Process | N/A | <p>The process resulted in a first edition of the ToF standard.</p> <p>Compliance: Not applicable</p> |

| | | | |
|--|----------------|-----|---|
| | | | Justification: The process resulted in a first edition of the ToF standard. |
| 8.3.2 The standardising body shall consider the latest scientific knowledge, research and relevant emerging issues. | Proce dures | YES | NCCF-STD-SSP-ToF 7.2.2: "NCCF shall consider the latest scientific knowledge, research and relevant emerging issues." Compliance: Conformity Justification: The procedures are identical with the PEFC requirement. |
| | Proce ss | N/A | The process resulted in a first edition of the ToF standard. Compliance: Not applicable Justification: The process resulted in a first edition of the ToF standard. |
| 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. | Proce dures | YES | NCCF-STD-SSP-ToF 7.3.1: "Where the feedback and the gap analysis do not identify a need to revise the standard, NCCF shall organize stakeholder consultation to determine whether stakeholders see a need for revising the standard. NCCF shall include the gap analysis in the stakeholder consultation." Compliance: Conformity Justification: The procedures are identical with the PEFC requirement. |
| | Proce ss | N/A | The process resulted in a first edition of the ToF standard. Compliance: Not applicable Justification: The process resulted in a first edition of the ToF standard. |
| 8.4.2 At the start of a review, the standardising body shall update the stakeholder identification mapping (refer to clause 6.2). | Proce dures | YES | NCCF-STD-SSP-ToF 7.3.2: "At the start of a review, NCCF shall update the stakeholder identification mapping." Compliance: Conformity Justification: The procedures are identical with the PEFC requirement. |
| | Proce ss | N/A | The process resulted in a first edition of the ToF standard. Compliance: Not applicable Justification: The process resulted in a first edition of the ToF standard. |

| 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, | Proce dures | YES | <p>NCCF-STD-SSP-ToF</p> <p>7.3.3: "NCCF shall organize:</p> <p>a) a public consultation period of at least 30 days and/or,</p> <p>b) stakeholder meetings."</p> <p>7.3.4: "The public consultation process during standard review and revision is as detailed in Section 5.7".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The procedures are identical with the PEFC requirement.</p> |
| | Proce ss | N/A | <p>The process resulted in a first edition of the ToF standard.</p> <p>Compliance: Not applicable</p> <p>Justification:</p> <p>The process resulted in a first edition of the ToF standard.</p> |
| (b) stakeholder meetings. | Proce dures | YES | <p>NCCF-STD-SSP-ToF</p> <p>7.3.3: "NCCF shall organize:</p> <p>a) a public consultation period of at least 30 days and/or,</p> <p>b) stakeholder meetings."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The procedures are identical with the PEFC requirement.</p> |
| | Proce ss | N/A | <p>The process resulted in a first edition of the ToF standard.</p> <p>Compliance: Not applicable</p> <p>Justification:</p> <p>The process resulted in a first edition of the ToF standard.</p> |
| 8.4.4 The standardising body shall announce the review in a timely manner (refer to 6.3). | Proce dures | YES | <p>NCCF-STD-SSP-ToF</p> <p>7.3.4: "NCCF shall announce the review in a timely manner. The public consultation process during standard review and revision is as detailed in Section 5.7".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The procedures are identical with the PEFC requirement.</p> |
| | Proce ss | N/A | <p>The process resulted in a first edition of the ToF standard.</p> <p>Compliance: Not applicable</p> <p>Justification:</p> |

| | | | |
|--|------------|-----|---|
| | | | The process resulted in a first edition of the ToF standard. |
| 8.5.1 Based on the feedback received during the period of a standard's implementation, the outcome of the gap analysis and the consultations, the standardising body shall decide whether to reaffirm the standard or whether a revision of the standard is necessary. | Procedures | YES | NCCF-STD-SSP-ToF 7.4.1: "Based on the feedback received during the period of a standard's implementation, the outcome of the gap analysis and the consultations, the NCCF shall decide whether to reaffirm the standard or whether a revision of the standard is necessary." Compliance: Conformity Justification: The procedures are identical with the PEFC requirement. |
| | Process | N/A | The process resulted in a first edition of the ToF standard. Compliance: Not applicable Justification: The process resulted in a first edition of the ToF standard. |
| 8.5.2 The decision shall be made at the highest decision-making level of the standardising body | Procedures | YES | NCCF-STD-SSP-ToF 7.4.2: "The decision shall be made at the highest decision-making level of the NCCF". Compliance: Conformity Justification: The procedures are identical with the PEFC requirement. |
| | Process | N/A | The process resulted in a first edition of the ToF standard. Compliance: Not applicable Justification: The process resulted in a first edition of the ToF standard. |
| 8.5.3 Where the decision is to reaffirm a standard, the standardising body shall provide a justification for the decision and make the justification publicly available. | Procedures | YES | NCCF-STD-SSP-ToF 7.4.3: "Where the decision is to reaffirm a standard, the NCCF shall provide a justification for the decision and make the justification publicly available". Compliance: Conformity Justification: The procedures are identical with the PEFC requirement. |
| | Process | N/A | The process resulted in a first edition of the ToF standard. Compliance: Not applicable Justification: The process resulted in a first edition of the ToF standard. |
| 8.5.4 Where the decision is to revise the standard, the | Procedures | YES | NCCF-STD-SSP-ToF |

| | | | |
|---|----------------|-----|--|
| standardising body shall specify the type of revision (normal or editorial revision). | | | <p>7.4.4: "Where the decision is to revise the standard, the NCCF shall specify the type of revision (normal or editorial revision).".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The procedures are identical with the PEFC requirement.</p> |
| | Proce ss | N/A | <p>The process resulted in a first edition of the ToF standard.</p> <p>Compliance: Not applicable</p> <p>Justification:</p> <p>The process resulted in a first edition of the ToF standard.</p> |
| Revision of standards | | | |
| <p>9.1 Procedures for revision of standard(s)/normative document(s) shall conform to those stated in section 6.</p> <p>A normal revision can occur at the periodic review, or between periodic reviews, but does not include editorial revisions and time-critical revisions.</p> | Proce dures | YES | <p>NCCF-STD-SSP-ToF</p> <p>8.5: "Revisions may be classified as:</p> <p>a. Normal</p> <p>Procedures for revision of standard(s)/normative document(s) shall conform to those stated in section 5.</p> <p>A normal revision can occur at the periodic review, or between periodic reviews, but does not include editorial revisions and time-critical revisions".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The procedures are identical with the PEFC requirement.</p> |
| | Proce ss | N/A | <p>The process resulted in a first edition of the ToF standard.</p> <p>Compliance: Not applicable</p> <p>Justification:</p> <p>The process resulted in a first edition of the ToF standard.</p> |
| <p>9.2 Editorial revisions can be made without triggering the normal revision process. The standardising body shall approve the editorial changes formally and publish an amendment or a new edition of the standard.</p> | Proce dures | YES | <p>NCCF-STD-SSP-ToF</p> <p>8.5: "Revisions may be classified as...:</p> <p>Editorial revisions can be made without triggering the normal revision process. The NCCF shall approve the editorial changes formally and publish an amendment or a new edition of the standard".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The procedures are identical with the PEFC requirement.</p> |
| | Proce ss | N/A | <p>The process resulted in a first edition of the ToF standard.</p> <p>Compliance: Not applicable</p> |

| | | | |
|---|----------------|-----|--|
| | | | Justification: The process resulted in a first edition of the ToF standard. |
| 9.3.1 A time-critical revision is a revision between two periodic reviews using a fast-track process. | Proce dures | YES | NCCF-STD-SSP-ToF 8.5: "Revisions may be classified as...: c. Time-critical revision A time-critical revision is a revision between two periodic reviews using a fast-track process. 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 b) Instruction by PEFC International to comply with specific or new PEFC requirements within a timescale that is too short for a normal revision". Compliance: Conformity Justification: The procedures are identical with the PEFC requirement. |
| | Proce ss | N/A | The process resulted in a first edition of the ToF standard. Compliance: Not applicable Justification: The process resulted in a first edition of the ToF standard. |
| 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 | Proce dures | YES | NCCF-STD-SSP-ToF 8.5: "Revisions may be classified as...: c. Time-critical revision A time-critical revision is a revision between two periodic reviews using a fast-track process. 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 b) Instruction by PEFC International to comply with specific or new PEFC requirements within a timescale that is too short for a normal revision". Compliance: Conformity Justification: The procedures are identical with the PEFC requirement. |
| | Proce ss | N/A | The process resulted in a first edition of the ToF standard. Compliance: Not applicable Justification: |

| | | | |
|--|----------------|-----|---|
| | | | The process resulted in a first edition of the ToF standard. |
| (b) Instruction by PEFC International to comply with specific or new PEFC requirements within a timescale that is too short for a normal revision. | Proce dures | YES | <p>NCCF-STD-SSP-ToF</p> <p>8.5: "Revisions may be classified as...:</p> <p>c. Time-critical revision</p> <p>A time-critical revision is a revision between two periodic reviews using a fast-track process. A time-critical revision can be conducted only in the following situations:</p> <p>a) Change in national laws and regulations affecting compliance with PEFC International requirements</p> <p>b) Instruction by PEFC International to comply with specific or new PEFC requirements within a timescale that is too short for a normal revision".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The procedures are identical with the PEFC requirement.</p> |
| | Proce ss | N/A | <p>The process resulted in a first edition of the ToF standard.</p> <p>Compliance: Not applicable</p> <p>Justification:</p> <p>The process resulted in a first edition of the ToF standard.</p> |
| 9.3.3 The time-critical revision shall follow these steps: | | | |
| (a) The standardising body shall draft the revised standard, | Proce dures | YES | <p>NCCF-STD-SSP-ToF</p> <p>8.5: "The time-critical revision shall follow these steps:</p> <p>a) NCCF shall draft the revised standard,</p> <p>b) NCCF may consult stakeholders,</p> <p>c) The revised standard shall be approved formally at the Governing Body, highest appropriate decision-making level of the NCCF,</p> <p>d) NCCF shall explain the justification for the urgent change(s) and make the justification publicly available."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The procedures are identical with the PEFC requirement.</p> |
| | Proce ss | N/A | <p>The process resulted in a first edition of the ToF standard.</p> <p>Compliance: Not applicable</p> <p>Justification:</p> <p>The process resulted in a first edition of the ToF standard.</p> |
| (b) The standardising body may consult | Proce dures | YES | <p>NCCF-STD-SSP-ToF</p> <p>8.5: "The time-critical revision shall follow these steps:</p> |

| | | | |
|--|----------------|-----|---|
| stakeholders, but it is not mandatory, | | | <p>a) NCCF shall draft the revised standard,</p> <p>b) NCCF may consult stakeholders,</p> <p>c) The revised standard shall be approved formally at the Governing Body, highest appropriate decision-making level of the NCCF,</p> <p>d) NCCF shall explain the justification for the urgent change(s) and make the justification publicly available."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The procedures are identical with the PEFC requirement.</p> |
| | Proce ss | N/A | <p>The process resulted in a first edition of the ToF standard.</p> <p>Compliance: Not applicable</p> <p>Justification:</p> <p>The process resulted in a first edition of the ToF standard.</p> |
| (c) The revised standard shall be approved formally at the highest appropriate decision-making level of the standardising body, | Proce dures | YES | <p>NCCF-STD-SSP-ToF</p> <p>8.5: "The time-critical revision shall follow these steps:</p> <p>a) NCCF shall draft the revised standard,</p> <p>b) NCCF may consult stakeholders,</p> <p>c) The revised standard shall be approved formally at the Governing Body, highest appropriate decision-making level of the NCCF,</p> <p>d) NCCF shall explain the justification for the urgent change(s) and make the justification publicly available."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The procedures are identical with the PEFC requirement.</p> |
| | Proce ss | N/A | <p>The process resulted in a first edition of the ToF standard.</p> <p>Compliance: Not applicable</p> <p>Justification:</p> <p>The process resulted in a first edition of the ToF standard.</p> |
| (d) The standardising body shall explain the justification for the urgent change(s) and make the justification publicly available. | Proce dures | YES | <p>NCCF-STD-SSP-ToF</p> <p>8.5: "The time-critical revision shall follow these steps:</p> <p>a) NCCF shall draft the revised standard,</p> <p>b) NCCF may consult stakeholders,</p> <p>c) The revised standard shall be approved formally at the Governing Body, highest appropriate decision-making level of the NCCF,</p> <p>d) NCCF shall explain the justification for the urgent change(s) and make the justification publicly available."</p> <p>Compliance: Conformity</p> <p>Justification:</p> |

| | | | |
|--|------------|-----|---|
| | | | The procedures are identical with the PEFC requirement. |
| | Process | N/A | <p>The process resulted in a first edition of the ToF standard.</p> <p>Compliance: Not applicable</p> <p>Justification:</p> <p>The process resulted in a first edition of the ToF standard.</p> |
| 9.4.1 A revision shall define the application date and transition period of the revised standard(s)/normative document(s). | Procedures | YES | <p>NCCF-STD-SSP-ToF</p> <p>8.2 “The revision shall define the application date and transition date of the revised standards/normative documents.”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard setting procedures satisfy the PEFC requirement.</p> |
| | Process | N/A | <p>The process resulted in a first edition of the ToF standard.</p> <p>Compliance: Not applicable</p> <p>Justification:</p> <p>The process resulted in a first edition of the ToF standard.</p> |
| 9.4.2 An application date shall not be more than one year after the publication of the standard. This allows time for endorsement of the revised standard(s)/normative document(s), introduction of change(s), information dissemination and training. | Procedures | YES | <p>NCCF-STD-SSP-ToF</p> <p>8.3 “The application date shall not exceed a period of one year from the publication of the standard. This is needed for the endorsement of the revised standards/normative documents, introducing the changes, information dissemination and training”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard setting procedures satisfy the PEFC requirement.</p> |
| | Process | N/A | <p>The process resulted in a first edition of the ToF standard.</p> <p>Compliance: Not applicable</p> <p>Justification:</p> <p>The process resulted in a first edition of the ToF standard.</p> |
| 9.4.3 The transition period shall not exceed one year. The standardising body may determine a longer period when justified by exceptional circumstances. | Procedures | YES | <p>NCCF-STD-SSP-ToF</p> <p>8.4 “The transition period shall not exceed a period of one year except in justified exceptional circumstances, where the implementation of the revised standards/normative documents requires a longer period”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard setting procedures satisfy the PEFC requirement.</p> |
| | Process | N/A | <p>The process resulted in a first edition of the ToF standard.</p> <p>Compliance: Not applicable</p> <p>Justification:</p> |

| | | | |
|--|--|--|--|
| | | | The process resulted in a first edition of the ToF standard. |
|--|--|--|--|

Annex B: Detailed assessment of the group certification model

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|--|-----------|--|
| 4. Context of the group organisation | | |
| 4.1 Understanding the group organisation and its context | | |
| The standard shall define how relevant external and internal issues of the group organisation shall be determined. A general framework for the group organisation shall be determined: | | |
| a) regional groups: group of forest owners/managers defined by regional borders and | N/A | Compliance: Not applicable Justification: NCCF-STD-GM-To 01/2019 does not define requirements for regional groups. |
| b) other groups and/or | YES | NCCF-STD-GM-ToF: 3 "The participants of a group certification shall be managed by a group entity that is centrally administered to ensure participants' conformity with the sustainable forest management/ToF standard and is subject to central review, and that all the participants shall be subject to an internal monitoring programme." Compliance: Conformity Justification: Chapter 3 defines general principles and aspects of the group certification. |
| c) whether there are any other specific circumstances which influence the implementation of the group management system. | YES | Chapter Introduction and Scope describe general aspects for small scale ToF operations in India that provide justification for the group certification. Compliance: Conformity Justification: The general principles of the group certification are described in chapter Scope. |
| 4.2 Understanding the needs and expectations of affected stakeholders | | |
| 4.2.1 The standard requires that the group organisation shall identify: | | |
| a) the affected stakeholders that are relevant for the group management system and | YES | NCCF-STD-GM-ToF 4.14: "The Group Entity shall identify the affected stakeholders that are relevant for the group management system and the relevant expectations of these affected stakeholders". Compliance: Conformity Justification: The document requires stakeholders identification. |
| b) the relevant expectations of these affected stakeholders. | YES | NCCF-STD-GM-ToF 4.14: "The Group Entity shall identify the affected stakeholders that are relevant for the group management system and the relevant expectations of these affected stakeholders". Compliance: Conformity |

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|---|-----------|---|
| | | Justification: The document requires identification of stakeholders expectations and needs. |
| 4.3 Determining the scope of the group management system | | |
| 4.3.1 The standard shall provide definitions relating to the following terms, which are in conformity with the definitions of those terms presented in chapter 3: | | |
| a) the group organisation and the elements of the group organisation (group entity and participant), | YES | NCCF-STD-GM-ToF, Appendix 2 “Group Entity A Group entity/individual represents the participants, with overall responsibility for ensuring the conformity of forest/ToF management in the certified area to the sustainable forest management/ToF standard and other applicable requirements of the forest/ToF certification scheme. Note: The relationship between the terms “group organisation”, “group entity” and “participant” is shown in Figure 1. The Group entity applies for the group certificate and finally holds the certificate”. “Group Organisation A group of participants represented by the group entity for the purposes of implementation of the sustainable forest management/ToF standard and its certification. Note 1: The term “group organisation” is equivalent to the term “region” or other terms chosen by the relevant forest/ToF certification scheme and complying with the content of this definition. Note 2: The relationship between the terms “group organisation”, “group entity” and “participant” is shown in Figure 1”. “Participant/ Group Members These are a forest/ToF and/or landowner/manager covered by the group certificate, who has the legal right to manage the forest/ToF in a clearly defined area, and the ability to implement the requirements of the sustainable forest management/ToF standard in that area and laid by group entity”. Compliance: Conformity Justification: The definitions are compatible with those defined in PEFC ST 1002:2018. Observation: The definition of “group organisation” Note1 makes reference to the “region” and other terms chosen by the relevant certification scheme. This wording was taken from PEFC ST 1002:2018. However, its meaning in the context of the NCCF’s scheme is confusing and misleading. |
| b) the certified area, | YES | NCCF-STD-GM-ToF, Appendix 2 |

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|--|-----------|--|
| | | <p>“Certified Area</p> <p>The forest/ToF area covered by a group certificate representing the sum of forest/ToF areas of the participants.”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The definition is compatible with the one defined in PEFC ST 1002:2018.</p> |
| c) the group certificate and | YES | <p>NCCF-STD-GM-ToF, Appendix 2</p> <p>“Group Certificate</p> <p>A document confirming that the group organisation complies with the requirements of the sustainable forest/ToF management standard and other applicable requirements of the forest/ToF certification scheme”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The definition is compatible with the one defined in PEFC ST 1002:2018.</p> |
| d) the document confirming participation in group certification. | YES | <p>NCCF-STD-GM-ToF, Appendix 2</p> <p>“Document confirming participation in group certification</p> <p>A document issued to an individual participant that refers to the group certificate and that confirms the participant/member as being covered by the scope of the group certification.</p> <p>Note: This document may be for instance a sub-certificate or a confirmation of participation”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The definition is compatible with the one defined in 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. | YES | <p>NCCF-STD-GM-ToF</p> <p>3.3: “Group organisation shall determine Scope of Group Management System including boundaries and applicability of Group Management system, as per the ToF STD applicability at Group level. The scope shall be made available as documented information”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document requires to determine the scope and boundaries of the group management system.</p> |
| 4.3.3 The standard shall define which requirements of the sustainable forest management standard may be fulfilled on group level. | YES | <p>NCCF-STD-GM-ToF</p> <p>The document does not define which requirements of the Standard can be applied at the group level.</p> <p>Compliance: Conformity</p> <p>Justification:</p> |

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|---|-----------|---|
| | | <p>The document does not define which requirements of the Standard can be applied at the group level.</p> <p>Therefore, it is assumed that all requirements of the FM and ToF standards shall be applied at the level of individual participants.</p> |
| 4.3.4 The standard requires that the scope shall be made available as documented information. | YES | <p>NCCF-STD-GM-ToF</p> <p>3.3: "Group organisation shall determine Scope of Group Management System including boundaries and applicability of Group Management system, as per the ToF STD applicability at Group level. The scope shall be made available as documented information".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document requires that the scope shall be available as documented information.</p> |
| 4.4 Group management system | | |
| 4.4.1 The standard requires that all participants shall be subject to the internal monitoring and the internal audit programme. | YES | <p>NCCF-STD-GM-ToF</p> <p>3.5: "The entity shall operate an annual internal monitoring programme that provides for the evaluation of the participants' conformity with the certification requirements".</p> <p>8.2a: "Group entity shall conduct an annual internal audit programme to ensure group management system is effectively implemented and maintained. It (internal audit) 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.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document (8.2b) ensures that all participants (management units) are subject to the internal audits as the sample is calculated based on all management units covered by the group.</p> |
| 4.4.2 The standard requires that a certified PEFC chain of custody system shall be in place if a group entity acts as a trader of forest based material not covered by group certificate. | YES | <p>NCCF-STD-GM-ToF</p> <p>10.1: "The Group entity shall have certified PEFC chain of custody system in place if a group entity also acts as a trader of tree based material not covered by group certificate.".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document requires a chain of custody and tracking system if the group entity also trades timber from areas not covered by the certificate.</p> |
| 5. Leadership | | |
| 5.1 Organisational roles, responsibilities and authorities | | |
| 5.1.1 Functions and responsibilities of the group entity | | |
| The standard requires that the following functions and responsibilities of the group entity shall be specified: | | |

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|--|-----------|---|
| a) to implement and maintain an effective management system covering all participants of the group; | YES | <p>NCCF-STD-GM-ToF</p> <p>3. "The participants of a group certification shall be managed by a group entity that is centrally administered to ensure participants' conformity with the sustainable forest management/ToF standard and is subject to central review, and that all the participants shall be subject to an internal monitoring programme".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement</p> |
| b) to represent the group organisation in the certification process, including in communications and relationships with the certification body, submission of an application for certification, and contractual relationship with the certification body; | YES | <p>NCCF-STD-GM-ToF</p> <p>4.1 "To represent the group organisation in the certification process, including in communications and relationships with the certification body, submission of an application for certification, and contractual relationship with the certification body".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p> |
| c) to establish written procedures for the management of the group organisation; | YES | <p>NCCF-STD-GM-ToF</p> <p>4.2A: "The entity shall establish clear objectives and written procedures for the management of the group organisation, in the form of a Group Management Plan, clearly defining the division of responsibilities between the Group entity and the members in relation to the management activities like adhering to the management planning, monitoring, harvesting, quality control etc, for the implementation of the applicable ToF NCCF Standard and shall be updated from time to time based on any recent changes."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement</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) | YES | <p>NCCF-STD-GM-ToF</p> <p>4.6 "The Group Entity shall establish, implement and maintain written procedures for the membership covering all applicable requirements of the applicable standard, according to scale and complexity of the group including...:</p> <p>c. Rules regarding eligibility for membership to the Group...</p> <p>d. Rules regarding withdrawal/suspension/exclusion of members from the Group and shall also have provision to ensure participants excluded from the group based on non-conformity to ToF Standard, cannot apply for group membership within 12 months after exclusion</p> <p>e. Clear description of the process to fulfill any corrective action requests issued internally and by certification body including timelines and implications if any of the corrective actions are not complied with</p> |

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|--|-----------|--|
| | | <p>f. Documented procedures for inclusion of new participants”.</p> <p>5.1: “The group entity shall maintain up-to-date records about the group entity and participants’ conformity with the requirements of the sustainable forest management/ToF standard, and other applicable requirements of the certification system NFCSS, including but not limited to:</p> <p>a. List of names and contact details of Participants, together with dates of entering and leaving the Group scheme, reason for leaving, and identification of their forest/ToF property and its/their size(s),. Group entity shall also ensure verification of the participant’s information about contact details, clear identification of their property, legal records and its/their size(s) as part of acceptance process into Group organisation.”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document requires procedures for acceptance of participants (4.6) and defines records that shall be kept on participants (5.1).</p> |
| e) to establish written procedures for the suspension and exclusion of participants who do not correct/close nonconformities. Group participants excluded from any certification group based on nonconformities cannot be accepted within 12 months after exclusion | YES | <p>NCCF-STD-GM-ToF</p> <p>4.6 “The group entity shall maintain up-to-date records about the group entity and participants’ conformity with the requirements of the ToF standard, and other applicable requirements of the certification system, including but not limited to...:</p> <p>d. Rules regarding withdrawal/suspension/exclusion of members from the Group and shall also have provision to ensure participants excluded from the group based on non-conformity to ToF Standard, cannot apply for group membership within 12 months after exclusion”.</p> <p>Compliance: Conformity</p> <p>The document requires written procedures for suspension or exclusion of the participant from the group and defines that participant excluded from the group shall not re-enter the group within 12 months.</p> |
| <p>f) to keep documented information of:</p> <p>i. the group entity and participants’ conformity with the requirements of the sustainable forest management standard, and other applicable requirements of the forest certification system,</p> <p>ii. all participants, including their contact details, identification of their forest property and its/their size(s),</p> <p>iii. the certified area,</p> <p>iv. the implementation of an internal monitoring programme, its review and any preventive and/or corrective actions taken;</p> | YES | <p>NCCF-STD-GM-ToF</p> <p>5.1. “The group entity shall maintain up-to-date records about the group entity and participants’ conformity with the requirements of the ToF standard, and other applicable requirements of the certification system, including but not limited to:</p> <p>a. List of names and contact details of Participants, together with dates of entering and leaving the Group scheme, reason for leaving, and identification of their forest/ToF property and its/their size(s). Group entity shall also ensure verification of the participant’s information about contact details, clear identification of their property, legal records and its/their size(s) as part of acceptance process into Group organisation.</p> <p>b. Any records of training provided to staff or Participants, relevant to the implementation of this standard and applicable NCCF standard;</p> |

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|---|-----------|--|
| | | <p>c. the certified area, map or supporting documentation describing or showing the location of the member's forest/ToF properties;</p> <p>d. Evidence of consent of all Participants;</p> <p>e. Documentation and records regarding recommended practices for ToF management (i.e. silvicultural systems); taken to correct any such non-compliance;</p> <p>f. the implementation of an internal monitoring programme, its review and any preventive and/or corrective actions taken.</p> <p>g. Records of the estimated annual overall NCCF production and sales of the Group.</p> <p>h. Documented information as the evidence of nature of non-conformities and subsequent corrective actions taken and its results.”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p> |
| <p>g) to establish connections with all participants based on a binding written agreement which shall include the participants' commitment to comply with the sustainable forest management standard. The group entity shall have a written contract or other written agreement with all participants covering the right of the group entity to implement and enforce any corrective or preventive measures, and to initiate the exclusion of any participant from the scope of certification in the event of nonconformity with the sustainable forest management standard;</p> <p>Note: The requirements for “participant commitment” and “written contract or other written agreement with all participants” may also be satisfied by the commitment of and written agreement of a pre-existing organisation or group or the members participation, such as a forest owners'/managers' association, SFM programme and submission to tax programming, where the organisation can demonstrate that it has a legal mandate to represent the participants and where its commitment and the terms and conditions of the contract are enforceable.</p> | YES | <p>NCCF-STD-GM-ToF</p> <p>4.8: “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 non-conformity with the applicable standard”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document requires a written agreement between a participant and the group manager that allows to enforce the certification requirements and any corrective/preventive measures and exclude the participant from the group certification.</p> |
| h) to provide all participants with a document confirming participation in the group forest certification; | YES | <p>4.10: “The Group Entity shall provide participants with a document confirming participation in the group certification”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> |

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|--|-----------|---|
| | | The document satisfies the PEFC requirement. |
| i) to provide all participants with information and guidance required for the effective implementation and maintenance of the sustainable forest management standard and other applicable requirements of the forest certification system; | YES | <p>NCCF-STD-GM-ToF</p> <p>4.11: "The Group Entity shall provide all participants with information and guidance required for the effective implementation of the sustainable management as per ToF standard and other applicable requirements of the NCCF standard.</p> <p>3.6: "The Group entity shall define training needs and implement training activities and/or communication strategies relevant to the implementation of the applicable NCCF standards".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p> |
| j) to address nonconformities reported from group members which were identified under other PEFC certifications than the particular group certification and to ensure implementation with all group members; | YES | <p>NCCF-STD-GM-ToF</p> <p>7.5: "If the group members were/are also certified under other relevant/similar certification (like NCCF SFM Certification):</p> <p>i. the group entity shall be informed of the previous group participation and existing certification under similar scheme same by the group members.</p> <p>ii. the group entity shall be informed of the nonconformities from the other group certification</p> <p>iii. the group entity shall address nonconformities reported from group members which were identified under other relevant/similar certification than the particular group certification and ensure implementation with all group members."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document requires the group entity to resolve non-conformities identified under other PEFC/NCCF certifications.</p> |
| k) to operate an internal monitoring programme that provides for the evaluation of the participants' conformity with the certification requirements; | YES | <p>3.5: "The entity shall operate an annual internal monitoring programme that provides for the evaluation of the participants' conformity with the certification requirements".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p> |
| l) to operate an annual internal audit programme covering both group members and group entity; | YES | <p>NCCF-STD-GM-ToF</p> <p>8.2a: "Group entity shall conduct an annual internal audit programme to ensure group management system is effectively implemented and maintained. It (internal audit) shall cover the group entity and all group participants".</p> <p>Compliance: Conformity</p> <p>Justification:</p> |

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|---|-----------|--|
| | | The document satisfies the PEFC requirement. |
| m) to operate a management review of the group forest certification and acting on the results from the review; | YES | <p>NCCF-STD-GM-ToF</p> <p>3.7: "The Group entity shall operate a review of conformity with the sustainable forest management/ToF standard. The review shall cover..."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p> |
| n) to provide full co-operation and assistance in responding effectively to all requests from the certification body, accreditation body, PEFC International or the National Governing Body for relevant data, documentation or other information; allowing access to the forest area covered by the group organisation and other facilities, whether in connection with formal audits or reviews or otherwise related or with implications for the management system. | YES | <p>NCCF-STD-GM-ToF</p> <p>7.3: To provide full co-operation and assistance in responding effectively to all requests from the group entity, certification body or NCCF for relevant data, documentation or other information, allowing access to the area and other facilities, regarding formal audits or reviews or otherwise."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p> |
| 5.1.2 Function and responsibilities of participants | | |
| The standard requires that the following functions and responsibilities of the participants shall be specified: | | |
| <p>a) To provide the group entity with a binding written agreement, including a commitment on conformity with the sustainable forest management standard and other applicable requirements of the forest certification system; group participants excluded from 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> | YES | <p>NCCF-STD-GM-ToF</p> <p>7.1 "To provide the group entity with a written agreement, including a commitment on conformity with the applicable standard and other applicable requirements of the certification system. Group participants excluded from 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 written agreement of the ToF owners/managers' association with the group entity, where the ToF /landowners/managers' association can demonstrate that it has a legal mandate to represent the participants and where its commitment and the terms and conditions of the written agreement are enforceable."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document requires [the participant] to provide a written agreement including commitment on conformity with certification requirements and requires that a participant excluded from a group cannot re-enter the group within 12 months.</p> |
| b) To provide the group entity with information about previous group participation. | YES | <p>NCCF-STD-GM-ToF</p> <p>7.5: "If the group members were/are also certified under other relevant/similar certification (like NCCF SFM Certification):</p> |

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|---|-----------|--|
| | | <p>i. the group entity shall be informed of the previous group participation and existing certification under similar scheme same by the group members.</p> <p>ii. the group entity shall be informed of the nonconformities from the other group certification</p> <p>iii. the group entity shall address nonconformities reported from group members which were identified under other relevant/similar certification than the particular group certification and ensure implementation with all group members”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p> |
| c) to comply with the sustainable forest management standard and other applicable requirements of the certification system as well as with the requirements of the management system; | YES | <p>NCCF-STD-GM-ToF</p> <p>7.2 “To comply with the certification standard other applicable requirements of the certification system as well as with requirements of the management system.”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p> |
| d) to provide full co-operation and assistance in responding effectively to all requests from the group entity, or certification body for relevant data, documentation or other information; allowing access to the forest and other facilities, whether in connection with formal audits or reviews or otherwise related or with implications for the management system; | YES | <p>NCCF-STD-GM-ToF</p> <p>7.3 “To provide full co-operation and assistance in responding effectively to all requests from the group entity, certification body or NCCF for relevant data, documentation or other information allowing access to the area and other facilities, regarding formal audits or reviews or otherwise”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement</p> |
| e) to inform the group entity about nonconformities identified under other PEFC certifications than the particular group certification. | YES | <p>NCCF-STD-GM-ToF</p> <p>7.5: “If the group members were/are also certified under other relevant/similar certification (like NCCF SFM Certification):</p> <p>i. the group entity shall be informed of the previous group participation and existing certification under similar scheme same by the group members.</p> <p>ii. the group entity shall be informed of the nonconformities from the other group certification</p> <p>iii. the group entity shall address nonconformities reported from group members which were identified under other relevant/similar certification than the particular group certification and ensure implementation with all group members”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p> |

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|---|-----------|--|
| f) to implement relevant corrective and preventive actions established by the group entity. | YES | <p>NCCF-STD-GM-ToF</p> <p>7.4 To implement relevant corrective and preventive actions established by the group entity"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p> |
| 5.2 Commitment and policy | | |
| 5.2.1 The standard requires that the group entity shall provide a commitment: | | |
| a) to comply with the sustainable forest management standard and other applicable requirements of the certification system; | YES | <p>NCCF-STD-GM-ToF</p> <p>3.8: "The Group entity shall provide for a public policy of commitment on behalf of the whole group organisation to comply with the applicable requirements of the ToF standards and shall also include commitment</p> <p>i. to integrate the group certification requirements in the group management system;</p> <p>ii. to continuously improve the group management system</p> <p>iii. to continuously support the improvement of the sustainable management of the land by the participants".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p> |
| b) to integrate the group certification requirements in the group management system; | YES | <p>NCCF-STD-GM-ToF</p> <p>3.8: "The Group entity shall provide for a public policy of commitment on behalf of the whole group organisation to comply with the applicable requirements of the ToF standards and shall also include commitment</p> <p>i. to integrate the group certification requirements in the group management system;</p> <p>ii. to continuously improve the group management system</p> <p>iii. to continuously support the improvement of the sustainable management of the land by the participants".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p> |
| c) to continuously improve the group management system; | YES | <p>NCCF-STD-GM-ToF</p> <p>3.8: "The Group entity shall provide for a public policy of commitment on behalf of the whole group organisation to comply with the applicable requirements of the ToF standards and shall also include commitment</p> |

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|---|-----------|--|
| | | <p>i. to integrate the group certification requirements in the group management system;</p> <p>ii. to continuously improve the group management system</p> <p>iii. to continuously support the improvement of the sustainable management of the land by the participants”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p> |
| d) to continuously support the improvement of the sustainable management of the land/forests by the participants. | YES | <p>NCCF-STD-GM-ToF</p> <p>3.8: “The Group entity shall provide for a public policy of commitment on behalf of the whole group organisation to comply with the applicable requirements of the ToF standards and shall also include commitment</p> <p>i. to integrate the group certification requirements in the group management system;</p> <p>ii. to continuously improve the group management system</p> <p>iii. to continuously support the improvement of the sustainable management of the land by the participants”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</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. | YES | <p>NCCF-STD-GM-ToF</p> <p>3.8: “The Group entity shall provide for a public policy of commitment on behalf of the whole group organisation to comply with the applicable requirements of the ToF standards and shall also include commitment...”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement by referring to a “public policy”.</p> |
| 5.2.3 The standard requires that the participants shall provide a commitment | | |
| a) to follow the rules of the management system; | YES | <p>NCCF-STD-GM-ToF</p> <p>7.1 [The participant] “To provide the group entity with a written agreement, including a commitment on conformity with the applicable standard and other applicable requirements of the certification system.”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement as the requirements for the group management are included amongst the applicable requirements of the NFCSS.</p> |

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|--|-----------|--|
| b) to implement the requirements of the sustainability standard in their operations in their area. | YES | <p>NCCF-STD-GM-ToF</p> <p>7.1 [The participant] “7.1 To provide the group entity with a written agreement, including a commitment on conformity with the applicable standard and other applicable requirements of the certification system.”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p> |
| 6. Planning | | |
| 6.1 The standard requires that if a group organisation plans any changes in the group management system, these changes shall be included in a group management plan. | YES | <p>NCCF-STD-GM-ToF</p> <p>4.2B. The entity shall establish written “Group management plan” primarily focusing on</p> <p>a) “introduction of changes in group management system (procedures)</p> <p>b) the ToF management planning requirements (Theme B of ToF standard)</p> <p>c) implementation of other requirements of the ToF where the group entity is responsible.”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document includes requirements for management planning.</p> |
| 6.2 The standard requires that if a group organisation decides to fulfil requirements of the sustainable forest management standard on the group level, these requirements shall be considered in a group management plan. | YES | <p>NCCF-STD-GM-ToF</p> <p>4.2B. The entity shall establish written “Group management plan” primarily focusing on</p> <p>a) “introduction of changes in group management system (procedures)</p> <p>b) the ToF management planning requirements (Theme B of ToF standard)</p> <p>c) implementation of other requirements of the ToF where the group entity is responsible.”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document includes requirements for management planning relating to fulfilling requirements of the ToF standard at the group level.</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. | YES | <p>NCCF-STD-GM-ToF</p> <p>6.2: “The Group entity shall have sufficient human and technical resources to establish, manage, control, improve, etc. the Group in line with the requirements of this standard”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p> |

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|--|-----------|--|
| 7.2 The standard shall define the necessary competence of persons doing work in the group management system. | YES | <p>NCCF-STD-GM-ToF</p> <p>4.7: "Group entity staff and Participants shall demonstrate knowledge of the Group's procedures and the applicable NCCF Standard".</p> <p>8.2e: "The group entity is responsible to develop and operate an annual internal monitoring programme to provide sufficient confidence in the conformity of the group organisation with the applicable standard. The elements of the internal monitoring programme shall include the following...:</p> <p>ii. Competence and selection of internal auditor..."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document requires the group entity staff to demonstrate knowledge on group's procedures and requires that the internal monitoring programme shall define competence of internal auditors.</p> |
| 7.3 The standard requires that communication processes shall be in place to raise the awareness of participants concerning: | | |
| a) the group management policy; | YES | <p>NCCF-STD-GM-ToF</p> <p>3.6. The Group entity shall define training needs and implement training activities and/or communication strategies relevant to the implementation of the applicable NCCF standards.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document requires the group entity to define communication strategy. However, the document does not include further detail of PEFC requirement 7.3.a.</p> |
| b) the requirements of the sustainable forest management standard; | YES | <p>NCCF-STD-GM-ToF</p> <p>3.6. The Group entity shall define training needs and implement training activities and/or communication strategies relevant to the implementation of the applicable NCCF standards.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document requires the group entity to define communication strategy. However, the document does not include further detail of PEFC requirement 7.3.b.</p> |
| c) their contribution to the effectiveness of the group management system and the sustainable forest management, including the benefits of improved group performance; | YES | <p>NCCF-STD-GM-ToF</p> <p>3.6. The Group entity shall define training needs and implement training activities and/or communication strategies relevant to the implementation of the applicable NCCF standards.</p> <p>Compliance: Conformity</p> <p>Justification:</p> |

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|---|-----------|--|
| | | The document requires the group entity to define communication strategy. However, the document does not include further detail of PEFC requirement 7.3.c. |
| d) the implications of not conforming with the group management system requirements. | YES | <p>NCCF-STD-GM-ToF</p> <p>3.6. The Group entity shall define training needs and implement training activities and/or communication strategies relevant to the implementation of the applicable NCCF standards.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document requires the group entity to define communication strategy. However, the document does not include further detail of PEFC requirement 7.3.d.</p> |
| 7.4 The standard requires that the internal and external communications relevant to the group management system shall be determined. This includes: | | |
| a) on what to communicate; | YES | <p>NCCF-STD-GM-ToF</p> <p>4.15: "The group entity shall determine and include in the Group Management Plan internal and external communications relevant to the group management system. This includes:</p> <ul style="list-style-type: none"> i. what to communicate; ii. when to communicate; iii. with whom to communicate; iv. how to communicate". <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p> |
| b) when to communicate; | YES | <p>NCCF-STD-GM-ToF</p> <p>4.15: "The group entity shall determine and include in the Group Management Plan internal and external communications relevant to the group management system. This includes:</p> <ul style="list-style-type: none"> i. what to communicate; ii. when to communicate; iii. with whom to communicate; iv. how to communicate". <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p> |
| c) with whom to communicate; | YES | <p>NCF-STD- GM-ToF 01/2019</p> <p>4.15: "The group entity shall determine and include in the Group Management Plan internal and external</p> |

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|---|-----------|---|
| | | <p>communications relevant to the group management system. This includes:</p> <ul style="list-style-type: none"> i. what to communicate; ii. when to communicate; iii. with whom to communicate; iv. how to communicate”. <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p> |
| d) how to communicate. | YES | <p>NCCF-STD-GM-ToF</p> <p>4.15: “The group entity shall determine and include in the Group Management Plan internal and external communications relevant to the group management system. This includes:</p> <ul style="list-style-type: none"> i. what to communicate; ii. when to communicate; iii. with whom to communicate; iv. how to communicate”. <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p> |
| 7.5 The standard requires that appropriate mechanisms shall be in place for resolving complaints and disputes relating to group management and sustainable forest management operations. | YES | <p>NCCF-STD-GM-ToF</p> <p>4.9: “The Group Entity shall establish, implement and maintain written procedures for the membership covering all applicable requirements of the applicable standard, according to scale and complexity of the group including:...</p> <ul style="list-style-type: none"> g. Complaints procedure ...”. <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</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; | YES | <p>NCCF-STD-GM-ToF</p> <p>4.9: “The Group Entity shall establish, implement and maintain written procedures for the membership covering all applicable requirements of the applicable standard, according to scale and complexity of the group including:...”.</p> <p>5.1: “The group entity shall maintain up-to-date records about the group entity and participants’ conformity with the requirements of the ToF standard, and other applicable requirements of the certification system, including but not limited to...”.</p> |

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|--|-----------|--|
| | | <p>5.2: "Group entity shall maintain updated documented information relevant to the group management system and the conformance with requirements of ToF Standard, which should be:..."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p> |
| b) available and suitable for use, where and when it is needed; | YES | <p>NCCF-STD-GM-ToF</p> <p>5.2: "Group entity shall maintain updated documented information relevant to the group management system and the conformance with requirements of ToF Standard, which should be:</p> <p>a. Available and suitable for use, where and when it is needed</p> <p>b. Adequately protected against loss of confidentiality, improper use or loss of integrity".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p> |
| c) adequately protected against loss of confidentiality, improper use, or loss of integrity. | YES | <p>NCCF-STD-GM-ToF</p> <p>5.2: "Group entity shall maintain updated documented information relevant to the group management system and the conformance with requirements of ToF Standard, which should be:</p> <p>a. Available and suitable for use, where and when it is needed</p> <p>b. Adequately protected against loss of confidentiality, improper use or loss of integrity".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p> |
| 8. Operation | | |
| 8.1 The standard requires that the group organisation shall plan, implement and control processes needed: | | |
| a) to meet the requirements of the group certification standard and the sustainable forest management standard and | YES | <p>NCCF-STD-GM-ToF</p> <p>4.2.A. "The entity shall establish clear objectives and written procedures for the management of the group organisation, in the form of a Group Management Plan, clearly defining the division of responsibilities between the Group entity and the members in relation to the management activities like adhering to the management planning, monitoring, harvesting, quality control etc, for the implementation of the applicable ToF NCCF Standard and shall be updated from time to time based on any recent changes".</p> <p>4.2B: "The entity shall establish written "Group management plan" primarily focusing on</p> <p>a) "introduction of changes in group management system (procedures)</p> |

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|--|-----------|---|
| | | <p>b) the ToF management planning requirements (Theme B of ToF standard)</p> <p>c) implementation of other requirements of the ToF where the group entity is responsible".</p> <p>Chapters 3, 4, 5, 6, 7 define specific requirements for the group management that the group entity and participants shall meet, including written procedures and control mechanism.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document requires the group entity and participants to meet requirements for the group management and management standards (FM, ToF), including requirements for planning.</p> |
| b) to implement the actions determined in 6. | YES | <p>NCCF-STD-GM-ToF</p> <p>4.2.A. "The entity shall establish clear objectives and written procedures for the management of the group organisation, in the form of a Group Management Plan, clearly defining the division of responsibilities between the Group entity and the members in relation to the management activities like adhering to the management planning, monitoring, harvesting, quality control etc, for the implementation of the applicable ToF NCCF Standard and shall be updated from time to time based on any recent changes".</p> <p>4.2B: "The entity shall establish written "Group management plan" primarily focusing on</p> <p>a) "introduction of changes in group management system (procedures)</p> <p>b) the ToF management planning requirements (Theme B of ToF standard)</p> <p>c) implementation of other requirements of the ToF where the group entity is responsible".</p> <p>Chapters 3, 4, 5, 6, 7 define specific requirements for the group management that the group entity and participants shall meet, including written procedures and control mechanism.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document requires the group entity and participants to meet requirements for the group management and management standards (FM, ToF).</p> |
| 8.2 The standard requires that this planning, implementing and controlling shall be done by: | | |
| a) defining the necessary processes and establishing criteria for those; | YES | <p>NCCF-STD-GM-ToF</p> <p>4.6. "Group organisation shall plan, implement and control processes needed to meet the requirement of ToF and group certification standard. It shall be done by:</p> |

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|---|-----------|--|
| | | <p>a. Defining the necessary processes and establishing criteria for those</p> <p>b. Implementing control of processes in accordance with the criteria</p> <p>c. Keeping documented information to the extent necessary to have confidence that the processes have been carried out as planned".</p> <p>Chapter 3, 4, 5, 6, 7 define specific requirements for the group management that the group entity and participants shall meet, including written procedures and control mechanism.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document requires to control its process by defining the processes and criteria for them.</p> |
| b) implementing control of the processes in accordance with the criteria; | YES | <p>NCCF-STD-GM-ToF</p> <p>4.6. "Group organisation shall plan, implement and control processes needed to meet the requirement of ToF and group certification standard. It shall be done by:</p> <p>a. Defining the necessary processes and establishing criteria for those</p> <p>b. Implementing control of processes in accordance with the criteria</p> <p>c. Keeping documented information to the extent necessary to have confidence that the processes have been carried out as planned".</p> <p>Chapter 3, 4, 5, 6, 7 define specific requirements for the group management that the group entity and participants shall meet, including written procedures and control mechanism.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document requires to control its process by defining the processes and criteria for them.</p> |
| c) keeping documented information to the extent necessary to have confidence that the processes have been carried out as planned. | YES | <p>NCCF-STD-GM-ToF</p> <p>4.6. "Group organisation shall plan, implement and control processes needed to meet the requirement of ToF and group certification standard. It shall be done by:</p> <p>a. Defining the necessary processes and establishing criteria for those</p> <p>b. Implementing control of processes in accordance with the criteria</p> <p>c. Keeping documented information to the extent necessary to have confidence that the processes have been carried out as planned".</p> <p>Chapter 3, 4, 5, 6, 7 define specific requirements for the group management that the group entity and participants shall meet, including written procedures and control mechanism.</p> |

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|---|-----------|---|
| | | shall meet, including written procedures and control mechanism. Compliance: Conformity Justification: The document requires to control its process by defining the processes and criteria for them, and keeping documented information on compliance. |
| 9. Performance evaluation | | |
| 9.1 Monitoring, measurement, analysis and evaluation | | |
| 9.1.1 The standard requires that an ongoing internal monitoring programme provides confidence in the conformity of the group organisation with the sustainable forest management standard. In particular, it shall be determined: | | |
| a) what shall be monitored and measured; | YES | NCCF-STD-GM-ToF 8.1.1. "Group Organisation shall have internal monitoring programme, on-going activity throughout the year, inclusive of following: a. Scope of monitoring and measurement b. Methods as applicable to ensure valid results c. Frequency or time-schedule for monitoring and as well as analysis and evaluation d. Documented information about the process, results and corrective actions as evidence". Compliance: Conformity Justification: The document includes requirements for internal monitoring programme that is identical with the PEFC requirements. |
| b) the methods for monitoring, measurement, analysis and evaluation, as applicable, to ensure valid results; | YES | NCCF-STD-GM-ToF 8.1.1. "Group Organisation shall have internal monitoring programme, on-going activity throughout the year, inclusive of following: a. Scope of monitoring and measurement b. Methods as applicable to ensure valid results c. Frequency or time-schedule for monitoring and as well as analysis and evaluation d. Documented information about the process, results and corrective actions as evidence". Compliance: Conformity Justification: The document includes requirements for internal monitoring programme that is identical with the PEFC requirements. |
| c) when the monitoring and measuring shall be performed; | YES | NCCF-STD-GM-ToF 8.1.1. "Group Organisation shall have internal monitoring programme, on-going activity throughout the year, inclusive of following: |

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|---|-----------|--|
| | | <p>a. Scope of monitoring and measurement</p> <p>b. Methods as applicable to ensure valid results</p> <p>c. Frequency or time-schedule for monitoring and as well as analysis and evaluation</p> <p>d. Documented information about the process, results and corrective actions as evidence".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document includes requirements for internal monitoring programme that are consistent with the PEFC requirements.</p> |
| d) when the results from monitoring and measurement shall be analysed and evaluated; | YES | <p>NCCF-STD-GM-ToF</p> <p>8.1.1. "Group Organisation shall have internal monitoring programme, on-going activity throughout the year, inclusive of following:</p> <p>a. Scope of monitoring and measurement</p> <p>b. Methods as applicable to ensure valid results</p> <p>c. Frequency or time-schedule for monitoring and as well as analysis and evaluation</p> <p>d. Documented information about the process, results and corrective actions as evidence".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document includes requirements for internal monitoring programme that are consistent with the PEFC requirements.</p> |
| e) what documented information shall be available as evidence of the results. | YES | <p>NCCF-STD-GM-ToF</p> <p>8.1.1. "Group Organisation shall have internal monitoring programme, on-going activity throughout the year, inclusive of following:</p> <p>a. Scope of monitoring and measurement</p> <p>b. Methods as applicable to ensure valid results</p> <p>c. Frequency or time-schedule for monitoring and as well as analysis and evaluation</p> <p>d. Documented information about the process, results and corrective actions as evidence".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document includes requirements for internal monitoring programme that are consistent with the PEFC requirements.</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. | YES | <p>NCCF-STD-GM-ToF</p> <p>8.1.2: "Group entity shall evaluate group management performance and effectiveness of group management system concerning implementation of ToF standard requirement".</p> |

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|--|-----------|--|
| | | <p>8.1.3: "Monitoring and control systems including monitoring visits to the certified area shall assist to check and confirm continued compliance with all the requirements of Standard, management plan and group membership's requirements".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document includes requirements for internal monitoring programme that are consistent with the PEFC requirements.</p> |
| 9.2 Internal audit | | |
| 9.2.1 Objectives | | |
| 9.2.1.1 The standard requires that an annual internal audit programme shall provide information on whether the group management system: | | |
| <p>a) conforms to</p> <p>i. the group organisation's own requirements for its group management system;</p> <p>ii. the requirements of the national group certification standard;</p> | YES | <p>NCCF-STD-GM-ToF</p> <p>8.2a: "Group entity shall conduct an annual internal audit programme to ensure group management system is effectively implemented and maintained. It (internal audit) 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".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document requires an internal audit programme that covers both the group management as well as participants.</p> |
| <p>b) ensures the implementation of the sustainable forest management standard on the participant level;</p> | YES | <p>NCCF-STD-GM-ToF</p> <p>8.2a: "Group entity shall conduct an annual internal audit programme to ensure group management system is effectively implemented and maintained. It (internal audit) 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".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document requires an internal audit programme that covers both the group management as well as participants.</p> |
| <p>c) is effectively implemented and maintained.</p> | YES | <p>NCCF-STD-GM-ToF</p> <p>8.2a: "Group entity shall conduct an annual internal audit programme to ensure group management system is effectively implemented and maintained. It (internal audit) 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".</p> |

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|--|-----------|---|
| | | Compliance: Conformity Justification: The document requires an internal audit programme that covers both the group management as well as participants. |
| 9.2.1.2 The standard requires that the internal audit programme shall cover the group entity and all group participants. The group entity shall be audited annually. The participants may be selected on a sample basis. | YES | NCCF-STD-GM-ToF 8.2a: "Group entity shall conduct an annual internal audit programme to ensure group management system is effectively implemented and maintained. It (internal audit) 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". Compliance: Conformity Justification: The document requires an internal audit programme that covers both the group management as well as participants. |
| 9.2.2 Organisation | | |
| The standard requires an internal audit programme which shall cover at least: | | |
| a) planning, establishing, implementing and maintaining an audit programme(s) including the frequency, methods, responsibilities, planning requirements and reporting, which shall take into consideration the importance of the processes concerned and the results of previous audits; | YES | NCCF-STD-GM-ToF 8.2e: "The group entity is responsible to develop and operate an annual internal audit programme to provide sufficient confidence in the conformity of the group organisation with the applicable standard. The elements of the internal audit programme shall include the following: i. Planning, establishing, implementing and maintaining an audit programme including the frequency, methods, responsibilities, planning requirements and reporting, which shall take into consideration the importance of the processes concerned and the results of the previous audits". Compliance: Conformity Justification: The document satisfies the PEFC requirement. |
| b) definition of the audit criteria and scope for each audit; | YES | NCCF-STD-GM-ToF 8.e: "The Group entity shall define criteria to be monitored at each internal audit and according to the group characteristics, risk factors and local circumstances.". Compliance: Conformity Justification: The document satisfies the PEFC requirement. |

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|--|-----------|---|
| c) competence of internal auditor (forest knowledge, standard knowledge); | YES | <p>NCCF-STD-GM-ToF</p> <p>8.2e: "The group entity is responsible to develop and operate an annual internal audit programme to provide sufficient confidence in the conformity of the group organisation with the applicable standard. The elements of the internal audit programme shall include the following:</p> <p>ii. Competence and selection of internal auditor to ensure the objectivity and impartiality of the audit process".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p> |
| d) selection of auditors and conducting of audits to ensure objectivity and the impartiality of the audit process; | YES | <p>NCCF-STD-GM-ToF</p> <p>8.2e: "The group entity is responsible to develop and operate an annual internal audit programme to provide sufficient confidence in the conformity of the group organisation with the applicable standard. The elements of the internal audit programme shall include the following:"</p> <p>ii. Competence and selection of internal auditor to ensure the objectivity and impartiality of the audit process".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p> |
| e) ensuring that the results of the audits are reported to relevant group management; | YES | <p>NCCF-STD-GM-ToF</p> <p>8.2e: "The group entity is responsible to develop and operate an annual internal audit programme to provide sufficient confidence in the conformity of the group organisation with the applicable standard. The elements of the internal audit programme shall include the following:...</p> <p>iii Ensuring that the results of the internal audit are reported and communicated to the group entity and the group participants ...".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p> |
| f) retaining of the documented information as evidence of the implementation of the audit programme and the audit results. | YES | <p>NCCF-STD-GM-ToF</p> <p>8.2e: "The group entity is responsible to develop and operate an annual internal audit programme to provide sufficient confidence in the conformity of the group organisation with the applicable standard. The elements of the internal audit programme shall include the following:...</p> <p>iv. Maintaining documented information for the implementation of the internal audit and audit results...".</p> |

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|---|-----------|--|
| | | Compliance: Conformity Justification: The document satisfies the PEFC requirement. |
| 9.3 Selection of participants in the internal audit programme | | |
| 9.3.1 General | | |
| 9.3.1.1 The standard requires the establishment of requirements for the selection of participants in the internal audit programme. These requirements shall include the following procedures for: | | |
| a) determination of the sample size (9.3.2); | YES | NCCF-STD-GM-ToF 8.3.2a: "The sample size shall be calculated separately for each category". 8.3.2b: "The sample size is calculated using Table 1 for all sets of 'like' management units..." Compliance: Conformity Justification: The document satisfies the PEFC requirement and includes requirements for determination of the sample size. |
| b) determination of sample categories(9.3.3); | YES | 8.3.1: "The sample sites for the audit will be selected from the different categories is depending on the size of management unit and type of ownership covered under group certification. Based on these two categories are defined as:...". Compliance: Conformity Justification: The document satisfies the PEFC requirement and defines sample categories. See evaluation of PEFC requirement 9.3.3. |
| c) distribution of the sample to the categories (9.3.4); | YES | NCCF-STD-GM-ToF See PEFC requirement 9.3.4. The document defines that the sampling shall be done separately for each category. Compliance: Conformity Justification: The document defines that the sampling shall be done separately for each category. See evaluation of PEFC requirement 9.3.4. |
| d) selection of the participants (9.3.5). | YES | NCCF-STD-GM-ToF 8.3.3a: "At least 25% of the sample should be selected at random from calculated units". 8.3.3b: "A risk-based procedure for the selection of the participants, based on species, ToF formations (selection from each available formation), any other special feature, complaints received, information on compliance etc. shall be taken into account to select the representative samples.". Compliance: Conformity |

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) | | | | | | | | | | | | | | | | | | | | | | | |
|--|----------------------|--|-----------------|----------------------|-----------------|--------------|---------------|-------------------|---------|-------|-----------|-----------|--------------|-----------|-----------|-----------|-------------------|-----------|------------|----------|----------|---------------|------------|----------|----------|
| | | Justification: The document defines requirements for selection of participants to the sample. See evaluation of PEFC requirement 9.3.5. | | | | | | | | | | | | | | | | | | | | | | | |
| 9.3.1.2 The standard may define additional requirements on the regional, national or sub-national level. | N/A | Compliance: Not mandatory requirement Justification: Not mandatory requirement. The document does not define additional element for sampling of participants | | | | | | | | | | | | | | | | | | | | | | | |
| 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. | N/A | Compliance: Not mandatory requirement Justification: Not mandatory requirement. The document does not define additional sampling requirements for participation of pre/existing organisations". | | | | | | | | | | | | | | | | | | | | | | | |
| 9.3.2 Determination of the sample size | | | | | | | | | | | | | | | | | | | | | | | | | |
| 9.3.2.1 The sample size shall be calculated for the participants of the group organisation. | YES | NCCF-STD-GM-ToF 8.3.2a: "The sample size shall be calculated separately for each category". 8.3.2b: "The sample size is calculated using Table 1 for all sets of 'like' management units...". <table><tr><th>Sample category</th><th>Size Class (ha)- (X)</th><th>Main evaluation</th><th>Surveillance</th><th>Re-evaluation</th></tr><tr><td rowspan="2">Cat. A Man. Units</td><td>>15,000</td><td>S = X</td><td>S = 0.7*X</td><td>S = 0.7*X</td></tr><tr><td>1,000-15,000</td><td>S = 0.4*X</td><td>S = 0.2*X</td><td>S = 0.3*X</td></tr><tr><td rowspan="2">Cat. B Man. Units</td><td>100-1,000</td><td>S = 0.8*√X</td><td>S=0.6*√X</td><td>S=0.6*√X</td></tr><tr><td>Less than 100</td><td>S = 0.6*√X</td><td>S=0.3*√X</td><td>S=0.4*√X</td></tr></table> <ul style="list-style-type: none">S is the number of management units to be sampled and evaluated. This number is calculated from above Table 1. (in case of decimal number it is rounded to the the upper whole number)X is the total number of the management units in the group Compliance: Conformity Justification: The document is stricter than PEFC ST 1002:2018 as it requires the sampling to be carried out separately for two sampling categories. | Sample category | Size Class (ha)- (X) | Main evaluation | Surveillance | Re-evaluation | Cat. A Man. Units | >15,000 | S = X | S = 0.7*X | S = 0.7*X | 1,000-15,000 | S = 0.4*X | S = 0.2*X | S = 0.3*X | Cat. B Man. Units | 100-1,000 | S = 0.8*√X | S=0.6*√X | S=0.6*√X | Less than 100 | S = 0.6*√X | S=0.3*√X | S=0.4*√X |
| Sample category | Size Class (ha)- (X) | Main evaluation | Surveillance | Re-evaluation | | | | | | | | | | | | | | | | | | | | | |
| Cat. A Man. Units | >15,000 | S = X | S = 0.7*X | S = 0.7*X | | | | | | | | | | | | | | | | | | | | | |
| | 1,000-15,000 | S = 0.4*X | S = 0.2*X | S = 0.3*X | | | | | | | | | | | | | | | | | | | | | |
| Cat. B Man. Units | 100-1,000 | S = 0.8*√X | S=0.6*√X | S=0.6*√X | | | | | | | | | | | | | | | | | | | | | |
| | Less than 100 | S = 0.6*√X | S=0.3*√X | S=0.4*√X | | | | | | | | | | | | | | | | | | | | | |
| 9.3.2.2 The size of the sample generally should be the square root of the number of participants: (y=√x), rounded to the upper whole number. | YES | See PEFC requirement 9.3.2.1 Compliance: Conformity Justification: The document defines different sampling formulas for different sampling category and type of audits (main evaluation, surveillance and re-certification). For category A, the sample will exceed the square root approach (when the total population exceeds 25 | | | | | | | | | | | | | | | | | | | | | | | |

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|--|-----------|--|
| | | <p>participants, $0,2 X = \sqrt{x}$) as it ranges from 20 to 100 % of the total population.</p> <p>For category B, the square root formula is used and the sample size ranges from $0.3\sqrt{x}$ to $0.8\sqrt{x}$.</p> <p>The differentiation of the size sample according to size/type of the management unit is logical and suitable. Also, the reduction of the sample for the lowest size categories is logical and allows an economically efficient auditing of a group with a large number of small landowners. The level of the reduction is considered as appropriate for the size class of the participants. The reductions of size sample for surveillance and re-evaluation are also applied by the IAF MD 1 for external auditing of multisite organisations.</p> <p>The document complies with the PEFC requirement as the size of the sample of square root is not an absolute requirement and is introduced with wording should.</p> |
| 9.3.2.3 The size of the sample may be adapted by a standard taking into account one or more of the following indicators: | | |
| a) results of a risk assessment. In this case deviations of sample sizes in case of low or high risk for individual categories shall be defined; | N/A | <p>Compliance: Not applicable (not mandatory requirement)</p> <p>Justification:</p> <p>The document does not apply all options provided by PEFC ST 1002:2018.</p> |
| b) results of internal audits or previous certification audits; | N/A | <p>Compliance: Not applicable (not mandatory requirement)</p> <p>Justification:</p> <p>The document does not apply all options provided by PEFC ST 1002:2018.</p> |
| c) quality / level of confidence of the internal monitoring programme; | N/A | <p>Compliance: Not applicable (not mandatory requirement)</p> <p>Justification:</p> <p>The document does not apply all options provided by PEFC ST 1002:2018.</p> |
| d) use of technologies allowing the gathering of information concerning specified requirements; Note: Such technologies may be e.g., the use of satellite data or drones and allow compliance statements for specific requirements of a sustainability standard or support the risk based sampling. | N/A | <p>Compliance: Not applicable (not mandatory requirement)</p> <p>Justification:</p> <p>The document does not apply all options provided by PEFC ST 1002:2018.</p> |
| e) based on other means of gathering information about activities on the ground. Note: One way could be a survey with participants who provide some information about their activities on the ground. | N/A | <p>Compliance: Not applicable (not mandatory requirement)</p> <p>Justification:</p> <p>The document does not apply all options provided by PEFC ST 1002:2018.</p> |
| 9.3.3 Determination of sample categories | | |

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|---|-----------|--|
| 9.3.3.1 The sample categories shall be established based on the results of a risk assessment. The indicators used in the risk assessment shall reflect the geographical scope of the standard. The following non exhaustive list of indicators may be used for the risk assessment: | | |
| a) ownership type (e.g. state forest, communal forest, private forest); | YES | <p>NCCF-STD-GM-ToF</p> <p>8.3.1: "The sample sites for the audit will be selected from the different categories depending on the size of management unit and type of ownership covered under group certification. Based on these two categories are defined as:</p> <p>i. Category A: Management units owned by government</p> <p>For example: State Forest Department/State Forest Corporation as the group entity taking legal representation of different administrative forest divisions or circles for certification purpose. Here, administrative divisions and circles will be the participants.</p> <p>ii. Category B: Management units owned by farmers</p> <p>For example: A group entity representing conglomeration management units owned by individuals, farmers and community".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document defines sample categories based on land ownership.</p> |
| b) size of management units (different size classes); | YES | <p>NCCF-STD-GM-ToF</p> <p>See description under PEFC requirement 9.3.2.1.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document defines sampling (sub)categories based on size of the management units.</p> |
| c) biogeographic region (e.g. lowlands, low mountain range, high mountain range); | N/A | <p>Compliance: Not applicable</p> <p>Justification:</p> <p>The document defines sample categories based on ownership type and size of the management units.</p> |
| d) operations, processes and products of potential group participants; | N/A | <p>Compliance: Not applicable</p> <p>Justification:</p> <p>The document defines sample categories based on ownership type and size of the management units.</p> |
| e) deforestation and forest conversion; | N/A | <p>Compliance: Not applicable</p> <p>Justification:</p> <p>The document defines sample categories based on ownership type and size of the management units.</p> |
| f) rotation period(s); | N/A | <p>Compliance: Not applicable</p> <p>Justification:</p> <p>The document defines sample categories based on ownership type and size of the management units.</p> |

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|--|-----------|---|
| g) richness of biological diversity; | N/A | Compliance: Not applicable Justification: The document defines sample categories based on ownership type and size of the management units. |
| h) recreation and other socio-economic functions of the forest; | N/A | Compliance: Not applicable Justification: The document defines sample categories based on ownership type and size of the management units. |
| i) dependence of and interaction with local communities and indigenous people; | N/A | Compliance: Not applicable Justification: The document defines sample categories based on ownership type and size of the management units. |
| j) available resources for administration, operations, training and research; | N/A | Compliance: Not applicable Justification: The document defines sample categories based on ownership type and size of the management units. |
| k) governance and law enforcement. | N/A | Compliance: Not applicable Justification: The document defines sample categories based on ownership type and size of the management units. |
| 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. | N/A | The document requires that the sample is calculated separately for each sampling category (8.2.2). This means that the sample is not distributed to the sample categories but is calculated separately for them based on number of participants in each category. The approach of the document will always result in higher size of the total sample (for all categories) than the approach defined in PEFC ST 1002:2018. Also, the risk evaluation is not necessary because the sample is calculated for consistent category. Compliance: Conformity Justification: The risk is determined by different sampling formula for each sample category. |
| 9.3.4 Distribution of the sample The sample shall be distributed to the categories according to the result of the risk assessment. | N/A | Compliance: Not applicable Justification: The document requires that the sample is calculated separately for each sampling category (8.2.2). This means that the sample is not distributed to the sample categories but is calculated separately for them based on number of participants in each category. The approach of the document always results in higher size of the total sample (for all categories) than the approach defined in PEFC ST 1002:2018. Also, the risk evaluation is not necessary because the sample is calculated for consistent category. |

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|--|-----------|---|
| 9.3.5 Selection of the participants | | |
| 9.3.5.1 At least 25% of the sample should be selected at random. | YES | <p>NCCF-STD-GM-ToF</p> <p>8.3.3a: "At least 25% of the samples shall be selected randomly from the calculated units".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p> |
| 9.3.5.2 A risk-based procedure for the selection of the participants shall be specified. | YES | <p>NCCF-STD-GM-ToF</p> <p>8.3.3b: "A risk-based procedure for the selection of the participants, based on species, ToF formations (selection from each available formation), any other special feature, complaints received, information on compliance etc. shall be taken into account to select the representative samples.".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document specifies the risk approach for selection of participants to the sample, including criteria to be used.</p> |
| 9.4 Management review | | |
| 9.4.1 The standard requires that an annual management review shall at least include: | | |
| a) the status of actions from previous management reviews; | YES | <p>NCCF-STD-GM-ToF</p> <p>3.7: "The Group entity shall operate a review of conformity with the sustainable forest management/ToF standard. The review shall cover:</p> <ul style="list-style-type: none"> i. the results of the internal monitoring programme and the certification body's evaluations and surveillance; ii. corrective and preventive measures if required; and iii. the evaluation of the effectiveness of corrective actions taken. iv. the status of actions from previous management reviews. v. the changes in external and internal issues. vi. opportunities for continual improvement. vii. outputs of the review include decisions related to continual improvement opportunities and any need for changes to the group management system." <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p> |
| b) changes in external and internal issues that are relevant to the group management system; | YES | <p>NCCF-STD-GM-ToF</p> <p>3.7: "The Group entity shall operate a review of conformity with the sustainable forest management/ToF standard. The review shall cover: ...</p> <ul style="list-style-type: none"> v. the changes in external and internal issues..." |

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|--|-----------|---|
| | | Compliance: Conformity Justification: The document satisfies the PEFC requirement. |
| c) the status of conformity with the sustainable forest management standard, that includes reviewing the results of the internal monitoring programme, the internal audit and the certification body's evaluations and surveillance; | YES | NCCF-STD-GM-ToF 3.7: "The Group entity shall operate a review of conformity with the sustainable forest management/ToF standard. The review shall cover: i. the results of the internal monitoring programme and the certification body's evaluations and surveillance; ii. corrective and preventive measures if required; and iii. the evaluation of the effectiveness of corrective actions taken. iv. the status of actions from previous management reviews. v. the changes in external and internal issues. vi. opportunities for continual improvement. vii. outputs of the review include decisions related to continual improvement opportunities and any need for changes to the group management system." Compliance: Conformity Justification: The document satisfies the PEFC requirement. |
| d) information on the group performance, including trends in: i. nonconformities and corrective actions; ii. monitoring and measurement results; iii. audit results; | YES | NCCF-STD-GM-ToF 3.7: "The Group entity shall operate a review of conformity with the sustainable forest management/ToF standard. The review shall cover: i. the results of the internal monitoring programme and the certification body's evaluations and surveillance; ii. corrective and preventive measures if required; and iii. the evaluation of the effectiveness of corrective actions taken. iv. the status of actions from previous management reviews. v. the changes in external and internal issues. vi. opportunities for continual improvement. vii. outputs of the review include decisions related to continual improvement opportunities and any need for changes to the group management system." Compliance: Conformity Justification: The document satisfies the PEFC requirement. |
| e) opportunities for continual improvement. | YES | NCCF-STD-GM-ToF |

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|---|-----------|---|
| | | <p>3.7: "The Group entity shall operate a review of conformity with the sustainable forest management/ToF standard. The review shall cover:</p> <ul style="list-style-type: none"> i. the results of the internal monitoring programme and the certification body's evaluations and surveillance; ii. corrective and preventive measures if required; and iii. the evaluation of the effectiveness of corrective actions taken. iv. the status of actions from previous management reviews. v. the changes in external and internal issues. vi. opportunities for continual improvement. vii. outputs of the review include decisions related to continual improvement opportunities and any need for changes to the group management system." <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</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. | YES | <p>NCCF-STD-GM-ToF</p> <p>3.7: "The Group entity shall operate a review of conformity with the sustainable forest management/ToF standard. The review shall cover:</p> <ul style="list-style-type: none"> i. , that includes reviewing the results of the internal monitoring programme and the certification body's evaluations and surveillance; ii. corrective and preventive measures if required; and iii. the evaluation of the effectiveness of corrective actions taken. iv. the status of actions from previous management reviews. v. the changes in external and internal issues. vi. opportunities for continual improvement. vii. outputs of the review include decisions related to continual improvement opportunities and any need for changes to the group management system." <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p> |
| 9.4.3 The standard requires that the group organisation shall retain documented information as evidence of the results of management reviews. | YES | <p>NCCF-STD-GM-ToF</p> <p>5.1: "The group entity shall maintain up-to-date records about the group entity and participants' conformity with the requirements of the ToF standard, and other applicable requirements of the certification system, including but not limited to:</p> |

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|---|-----------|--|
| | | <p>f. the implementation of an internal monitoring programme, its review and any preventive and/or corrective actions taken”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p> |
| 10. Improvement | | |
| 10.1 Nonconformity and corrective action | | |
| 10.1.1 The standard requires when a nonconformity occurs, the group organisation shall: | | |
| <p>a) react to the nonconformity and, as applicable:</p> <p>i. take action to control and correct it;</p> <p>ii. deal with the consequences;</p> | YES | <p>NCCF-STD-GM-ToF</p> <p>9.1a: “Group organisation shall take react and take appropriate corrective actions to address the non-conformity and shall be prepared to deal with consequences as well.”.</p> <p>9.1b: “Group organisation shall evaluate the need for action to eliminate the causes of the nonconformity, in order that it does not recur or occur elsewhere, by:</p> <p>i. reviewing the nonconformity;</p> <p>ii. determining the causes of the nonconformity;</p> <p>iii. determining if similar nonconformities exist, or could potentially occur”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document requires to react to non-conformities from internal monitoring programme or external audits by defining corrective and preventive measures.</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> | NO | <p>NCCF-STD-GM-ToF</p> <p>9.1b: “Group organisation shall evaluate the need for action to eliminate the causes of the nonconformity, in order that it does not recur or occur elsewhere, by:</p> <p>i. reviewing the nonconformity;</p> <p>ii. determining the causes of the nonconformity;</p> <p>iii. determining if similar nonconformities exist, or could potentially occur”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document requires to react to non-conformities from internal monitoring programme or external audits by defining corrective and preventive measures.</p> |
| <p>c) implement any action needed;</p> | YES | <p>NCCF-STD-GM-ToF</p> <p>9.1c: “Group organisation shall implement any action needed and review the effectiveness of any corrective action taken. It shall also make changes to the group management system, if necessary”.</p> |

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|--|-----------|---|
| | | Compliance: Conformity Justification: The document requires to react to non-conformities from internal monitoring programme or external audits by defining corrective and preventive measures. |
| d) review the effectiveness of any corrective action taken; | YES | NCCF-STD-GM-ToF 9.1c: "Group organisation shall implement any action needed and review the effectiveness of any corrective action taken. It shall also make changes to the group management system, if necessary". Compliance: Conformity Justification: The document requires to react to non-conformities from internal monitoring programme or external audits by defining corrective and preventive measures, and review their effectiveness. |
| e) make changes to the group management system, if necessary. | YES | NCCF-STD-GM-ToF 9.1c: "Group organisation shall implement any action needed and review the effectiveness of any corrective action taken. It shall also make changes to the group management system, if necessary". Compliance: Conformity Justification: The document requires to react to non-conformities from internal monitoring programme or external audits by defining corrective and preventive measures, and make changes to the group management system, if necessary. |
| 10.1.2 The standard requires that the group organisation shall retain documented information as evidence of: | | |
| a) the nature of the nonconformities and any subsequent actions taken; | YES | NCCF-STD-GM-ToF 5.1: "The group entity shall maintain up-to-date records about the group entity and participants' conformity with the requirements of the ToF standard, and other applicable requirements of the certification system, including but not limited to: ... e. Documentation and records regarding recommended practices for forest/ToF management (i.e. silvicultural systems); taken to correct any such non-compliance f. the implementation of an internal monitoring programme, its review and any preventive and/or corrective actions taken h. Documented information as the evidence of nature of non-conformities and subsequent corrective actions taken and its results...". Compliance: Conformity Justification: |

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|--|-----------|---|
| | | The document requires to keep records on recommended practices to correct non-conformities, and corrective and preventive measures (5.1e, f). |
| b) the results of any corrective action. | YES | <p>NCCF-STD-GM-ToF</p> <p>5.1: "The group entity shall maintain up-to-date records about the group entity and participants' conformity with the requirements of the ToF standard, and other applicable requirements of the certification system, including but not limited to: ...</p> <p>e. Documentation and records regarding recommended practices for forest/ToF management (i.e. silvicultural systems); taken to correct any such non-compliance</p> <p>f. the implementation of an internal monitoring programme, its review and any preventive and/or corrective actions taken</p> <p>h. Documented information as the evidence of nature of non-conformities and subsequent corrective actions taken and its results..."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document requires to keep records on recommended practices to correct non-conformities, and corrective and preventive measures (5.1e, f).</p> |
| 10.1.3 The standard requires that a participant who was excluded from a group certification shall be internally audited by the group entity before it is allowed to re-enter the group certification. The internal audit shall not take place sooner than 12 months after the exclusion. | YES | <p>NCCF-STD-GM-ToF</p> <p>4.9d: "Rules regarding withdrawal/ suspension/exclusion of members from the Group and shall also have provision to ensure participants excluded from the group based on non-conformity to ToF Standard, cannot apply for group membership within 12 months after exclusion".</p> <p>5.1: "The group entity shall maintain up-to-date records about the group entity and participants' conformity with the requirements of the ToF standard, and other applicable requirements of the certification system, including but not limited to:</p> <p>h. Documented information as the evidence of nature of non-conformities and subsequent corrective actions taken and its results".</p> <p>8.2e/vi: "At the time of joining the group organization, individual participants shall undertake initial assessment against the applicable standard, either through a self-assessment or an assessment by the group entity. In the case of a self-assessment, the assessment shall be reviewed by the group entity".</p> <p>9.1c. "Group organisation shall implement any action needed and review the effectiveness of any corrective action taken".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document requires that the participants that was excluded from the group can only re-enter the group after 12 months. The document also specifies an initial</p> |

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|---|-----------|---|
| | | assessment of the participant and requirements for implementation and review of any non-conformity. |
| <p>10.2 Continual improvement</p> <p>The standard requires that the suitability, adequacy and effectiveness of the group management system and the sustainable management of the forest shall be continuously improved.</p> | YES | <p>NCCF-STD-GM-ToF</p> <p>9.2: "Group organisation shall ensure continual improvement regarding suitability, adequacy and effectiveness of sustainable management of ToF and group management system".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p> |

Annex D: Detailed assessment of the Trees outside Forests (ToF) standard

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|---|-----------|--|
| Context of the national standard and the organisations applying a PEFC endorsed standard | | |
| 4.1 General The requirements for sustainable forest management defined by regional, national or sub-national forest management standards shall: | | |
| a) include management and performance requirements that are applicable at the forest management unit level, or at another level as appropriate, to ensure that the intent of all requirements is achieved at the forest management unit level; Note: An example of a situation where a requirement can be defined as being at another level (e.g. group/regional) is monitoring of forest health. Through monitoring of forest health at regional level, and communicating of results at the FMU level, the objective of the requirement is met without the necessity to carry out the individual monitoring of each forest management unit. | YES | NCCF-STD-ToF: The Standard defines requirements that are applicable at the management unit level. Due to small scale ownership of the ToF land, the standard also allows for a number of requirements, especially those that are relevant to management planning, to be fulfilled at the group level when the group certification approach is applied. Compliance: Conformity Justification: The standard includes requirements for the management unit level, both management system (planning, monitoring, etc.) as well as performance-based requirements. |
| b) be clear, performance based and auditable; | YES | Compliance: Conformity Justification: The standard includes requirements that are clear, performance-based and auditable. |
| c) apply to activities of all forest operators in the defined forest area who have an impact on achieving compliance with the requirements; | YES | NCCF-STD-ToF Scope: "Standard is also applicable to the activities of all operators in the defined certified area, who have an impact on achieving compliance with the requirement. Operators shall refer to personnel's responsible for certain operations such as harvesting and trading of standing trees etc. on certified land". Compliance: Conformity Justification: The Standard (chapter Scope) includes requirement that the standard also applies to all operators on the defined certified land with an impact on compliance with the ToF standard. |
| d) require record-keeping that provides evidence of compliance with the requirements of the forest management standards; | YES | NCCF-STD-ToF The Standard includes specific requirements (indicators) that specify which records and evidence shall be kept and made available for certification purposes. Compliance: Conformity Justification: The Standard does not include a single requirement that would require records keeping. However, individual indicators include requirements relating to keeping records |

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|--|-----------|--|
| | | and evidence as means of demonstration of compliance with the Criteria of the Standard. |
| <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> | YES | <p>NCCF-STD-ToF</p> <p>2.7.3: “Procedures shall be in place to ensure proper usage of PEFC claim and logo & trademark usage and follow guidelines regarding trademark usage...</p> <p>b. “100% PEFC certified” as claim to be used to communicate the origin of products in an area covered by the standard to customers/buyers with a PEFC chain of custody...”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires that the PEFC claim “100 % PEFC certified” (or a system specific claim) shall be used to communicate the origin of products in a certified area.</p> |
| <p>f) require that where owners/managers of forests are selling products from areas other than covered by the standard, only products from areas covered by the standard are sold with the claim “100% PEFC-certified” or a system specific claim;</p> | YES | <p>NCCF-STD-ToF</p> <p>2.7.3: “Procedures shall be in place to ensure proper usage of PEFC claim and logo & trademark usage and follow guidelines regarding trademark usage...</p> <p>c. where owners/managers of tree outside 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 “PEFC-certified...”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires that where owners/managers are also selling material from other area than certified ToF, only material from the certified ToF can sold with the PEFC claim.</p> |
| <p>g) require that claims on the origin of products in an area covered by the standard are only made by forest owners/managers covered by a PEFC recognised certificate issued against the standard;</p> | YES | <p>NCCF-STD-ToF</p> <p>2.7.3: “Procedures shall be in place to ensure proper usage of PEFC claim and logo & trademark usage and follow guidelines regarding trademark usage...</p> <p>a. only owners/managers of ToF covered by the PEFC recognised certificate issued against this standard shall be allowed to make the PEFC claim...”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires that only an owner/manager that is covered by the PEFC recognised certificate issued against the Standard can make the PEFC claim.</p> |
| <p>h) specify requirements concerning the information which need to be provided to a PEFC chain of custody certified customer;</p> | YES | <p>NCCF-STD-ToF</p> <p>2.7.3d: “Following information needs to be included on the delivery document regarding PEFC Certified material:</p> <ol style="list-style-type: none"> 1. Name and other details of seller and buyer |

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|---|-----------|--|
| | | <p>2. Product identification (product category and species)</p> <p>3. Quantity of products</p> <p>4. Date of delivery/delivery period/accounting period</p> <p>5. Applicable PEFC 100% certified claim</p> <p>6. Certificate number of selling organisation".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires information that shall be communicated in delivery documentation for certified products. The information is consistent with PEFC ST 2002:2020.</p> |
| i) include an overview of applicable legislation, if requirements of this benchmark are not reflected in the regional, national or sub-national standard, because they are already addressed through the legislation. | YES | <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard is meeting the PEFC requirements directly through its provisions.</p> |
| 4.2 Understanding the needs and expectations of affected stakeholders | | |
| The standard requires that the organisation shall determine: | | |
| a) the affected stakeholders that are relevant to the sustainable forest management; | YES | <p>NCCF-STD-ToF</p> <p>Scope: "The standard requires that the organisation shall determine:</p> <p>a) the affected stakeholders that are relevant to the sustainable forest management.</p> <p>b) the relevant needs and expectations of these stakeholders..."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires to identify stakeholders and their needs.</p> <p>Observation:</p> <p>The requirement is placed in chapter Scope. It should be noted that the purpose of the chapter Scope in standards is not to define individual requirements but rather application of the whole Standard.</p> |
| b) the relevant needs and expectations of these stakeholders. | YES | <p>NCCF-STD-ToF</p> <p>Scope: "The standard requires that the organisation shall determine:</p> <p>a) the affected stakeholders that are relevant to the sustainable forest management.</p> <p>b) the relevant needs and expectations of these stakeholders..."</p> |

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|--|-----------|---|
| | | Compliance: Conformity Justification: The Standard requires to identify stakeholders and their needs. |
| 4.3 Determining the scope of the management system | | |
| 4.3.1 The standard requires that the organisation shall determine the boundaries and applicability of the management system to establish its scope. | YES | NCCF-STD-ToF Chapter Scope determines the application of the standard, defines three main types of the ToF (with additional subcategories) and defines three major types of the ToF's organizational implementation modules and related certifications. Compliance: Conformity Justification: The Standard defines the scope of the PEFC certification by chapter Scope. Firstly, the standard applies to owners / managers of ToF, the standard applies to "certified areas", the Standard defines three types of ToF to which it applies and the scope of the management system is limited to activities that are defined by the requirements of the standard. |
| 4.3.2 The standard requires that TOF 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 TOF management practices. This shall form a basis for a cycle of continuous improvement. | YES | NCCF-STD-ToF Criterion 2.1: "Management Plan, should be area specific covering LMU ownership and tree species details, planting details, agriculture cropping pattern, harvesting regime, operations aimed at environmental protection and amenities and social safeguards. It should be prepared by the farmer/owner or jointly by a group of farmers, tree growers or professionals. Similarly, Management Plans for UTF should cover ownership & tree species details, monitoring mechanism of the tree health and removal of unhealthy/dying/dangerous plants and their replacement and operations for environmental protection and recreation". Indicator 2.1.2: "The management plan addresses the following elements: a) objectives of ToFM b) description of the ToF resources (site and species) c) maps of the operational area d) silvicultural practises (clear cuts, selective cuts, thinning, replanting), harvesting cycle and methods. e) plans for monitoring growth of trees f) environmental and social impacts of ToFM operations. g) conservation of rare species and high conservation areas/ values h) pest, disease and weed control plan |

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|---|-----------|--|
| | | <p>i) duration of the plan".</p> <p>Criterion 2.6: "Periodic inventory of resources, record of harvesting, monitoring & evaluation of management operations is included in the management plan. This forms a basis for sustainability of the ToF resource".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The requirements for planning (2.1 and 2.6) describe the management cycle of inventory, planning, implementation, monitoring and evaluation, including the environmental and risk assessment.</p> |
| 5. Leadership | | |
| 5.1 The standard requires that the organisation shall provide a commitment: | | |
| a) to comply with the sustainable forest management standard and other applicable requirements of the certification system; | YES | <p>NCCF-STD-ToF</p> <p>2.1.4: "The organisation shall provide a commitment in management plan and it shall be publicly available:</p> <p>a) to comply with the sustainable ToF management standard and other applicable requirements of the certification system;</p> <p>b) to continuously improve the sustainable ToF management system."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires a public commitment satisfying the PEFC requirement (2.1.4).</p> |
| b) to continuously improve the sustainable forest management system. | YES | <p>NCCF-STD-ToF</p> <p>2.1.4: "The organisation shall provide a commitment in management plan and it shall be publicly available:</p> <p>a) to comply with the sustainable ToF management standard and other applicable requirements of the certification system;</p> <p>b) to continuously improve the sustainable ToF management system."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires a public commitment satisfying the PEFC requirement.</p> |
| 5.2 The standard requires that this commitment shall be publicly available. | YES | <p>NCCF-STD-ToF</p> <p>2.1.4: "The organisation shall provide a commitment in management plan and it shall be publicly available:</p> <p>a) to comply with the sustainable ToF management standard and other applicable requirements of the certification system;</p> |

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|---|-----------|--|
| | | <p>b) to continuously improve the sustainable ToF management system."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires a public commitment satisfying the PEFC requirement.</p> |
| 5.3 The standard requires that responsibilities for sustainable forest management shall be clearly defined and assigned. | YES | <p>NCCF-STD-ToF</p> <p>Criterion 2.5: "Roles and responsibilities for sustainable management of ToF resources to be clearly defined in the management plan".</p> <p>Indicator 2.5.1: "Management plan clearly defines the role and responsibilities of the resource owners, manager, and workers".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires to identify responsibilities for the ToF management.</p> |
| 6. Planning | | |
| 6.1 Actions to address risks and opportunities | | |
| 6.1.1 The standard requires that the organisation shall consider risks and opportunities concerning compliance with the requirements for sustainable forest management. Size and scale of the operations of the organisation shall be considered. | YES | <p>NCCF-STD-ToF</p> <p>Chapter Introduction and Scope</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard does not require owners/managers to consider risks and opportunities, including consideration of the scale and size of the operations.</p> <p>However, chapter Introduction and Scope describes the risks and opportunities relating to the management of ToF; considers different types of TOFs and different modules of the implementation taking into account size and scale of the TOF operations.</p> |
| 6.1.2 The standard requires that inventory and mapping of forest resources shall be established and maintained, adequate to local and national conditions and in correspondence with the requirements described in this international benchmark standard. | YES | <p>NCCF-STD-ToF</p> <p>Criterion 2.1: "Management Plan, should be area specific covering LMU ownership and tree species details, planting details, agriculture cropping pattern, harvesting regime, operations aimed at environmental protection and amenities and social safeguards. It should be prepared by the farmer/owner or jointly by a group of farmers, tree growers or professionals.</p> <p>Similarly, Management Plans for UTF should cover ownership & tree species details, monitoring mechanism of the tree health and removal of unhealthy/dying/dangerous plants and their replacement and operations for environmental protection and recreation".</p> |

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|---|-----------|---|
| | | <p>Indicator 2.1.2: "The management plan addresses the following elements:</p> <ul style="list-style-type: none"> a) objectives of ToFM b) description of the ToF resources (site and species) c) maps of the operational area d) silvicultural practises (clear cuts, selective cuts, thinning, replanting), harvesting cycle and methods. e) plans for monitoring growth of trees f) environmental and social impacts of ToFM operations. g) conservation of rare species and high conservation areas/ values h) pest, disease and weed control plan i) duration of the plan". <p>Criterion 2.6: "Periodic inventory of resources, record of harvesting, monitoring & evaluation of management operations is included in the management plan. This forms a basis for sustainability of the ToF resource".</p> <p>Indicator 2.6.1: "ToFM maintains records of planting, periodic inventory of the LMU".</p> <p>Indicator 2.6.2: "Written records are kept for the harvest of ToF products to ensure the traceability as per chain of custody (CoC) procedures".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The requirements for planning (2.1 and 2.6) include requirements for inventory of ToF resources.</p> |
| 6.2 Management plan | | |
| 6.2.1 The standard requires that management plans shall be: | | |
| a) elaborated and periodically updated or continually adjusted; | YES | <p>NCCF-STD-ToF</p> <p>Criterion 2.1: "Management Plan, should be area specific covering LMU ownership and tree species details, planting details, agriculture cropping pattern, harvesting regime, operations aimed at environmental protection and amenities and social safeguards. It should be prepared by the farmer/owner or jointly by a group of farmers, tree growers or professionals.</p> <p>Similarly, Management Plans for UTF should cover ownership & tree species details, monitoring mechanism of the tree health and removal of unhealthy/dying/dangerous plants and their replacement and operations for environmental protection and recreation".</p> <p>Indicator 2.1.2: "The management plan addresses the following elements:</p> <ul style="list-style-type: none"> a) objectives of ToFM b) description of the ToF resources (site and species) |

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|--|-----------|--|
| | | <p>c) maps of the operational area</p> <p>d) silvicultural practises (clear cuts, selective cuts, thinning, replanting), harvesting cycle and methods.</p> <p>e) plans for monitoring growth of trees</p> <p>f) environmental and social impacts of ToFM operations.</p> <p>g) conservation of rare species and high conservation areas/ values</p> <p>h) pest, disease and weed control plan</p> <p>i) duration of the plan".</p> <p>Criterion 2.4: Management plan, will be maintained and periodically updated based on monitoring results, local conditions, legislations, and professional advice(s), as and when required".</p> <p>Indicator 2.4.1: "Management plan is updated as and when changes occur due to local conditions, legislations or any other reason".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The requirements for planning (2.4) require periodic revision of management plans.</p> |
| b) appropriate to the size and use of the forest area; | YES | <p>NCCF-STD-ToF</p> <p>Criterion 2.1: "Management Plan, should be area specific covering LMU ownership and tree species details, planting details, agriculture cropping pattern, harvesting regime, operations aimed at environmental protection and amenities and social safeguards. It should be prepared by the farmer/owner or jointly by a group of farmers, tree growers or professionals.</p> <p>Similarly, Management Plans for UTF should cover ownership & tree species details, monitoring mechanism of the tree health and removal of unhealthy/dying/dangerous plants and their replacement and operations for environmental protection and recreation".</p> <p>Indicator 2.1.2: "The management plan addresses the following elements:..."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The suitability of the management plan to the size and use for the area is integrated into elements required by Criterion 2.1. This criterion also indicates that the management plan can be developed at the group level in case of farmers.</p> |
| c) based on applicable local, national and international legislation as well as existing land-use or other official plans; and | YES | <p>Criterion 1.1: "Trees outside Forests Management (ToFM) complies with all applicable national, state, and local legislations and rules pertaining to forest and revenue lands; and the payment of applicable royalties and taxes as well as international treaties and regulations.".</p> |

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|---|-----------|--|
| | | <p>Indicator 1.1.1: "Compliance with all applicable central, state and local laws, rules and regulations be demonstrated".</p> <p>Indicator 1.1.2: "Compliance to these legislations shall include, but not limit to, agriculture, forests, trees 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; crop damage compensation, anti-corruption".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires compliance with legal requirements (1.1) and this also apply to ToF planning.</p> |
| d) adequately covering forest resources. | YES | <p>NCCF-STD-ToF</p> <p>Criterion 2.1: "Management Plan, should be area specific covering LMU ownership and tree species details, planting details, agriculture cropping pattern, harvesting regime, operations aimed at environmental protection and amenities and social safeguards. It should be prepared by the farmer/owner or jointly by a group of farmers, tree growers or professionals.</p> <p>Similarly, Management Plans for UTF should cover ownership & tree species details, monitoring mechanism of the tree health and removal of unhealthy/dying/dangerous plants and their replacement and operations for environmental protection and recreation".</p> <p>Indicator 2.1.2: "The management plan addresses the following elements:</p> <ul style="list-style-type: none"> a) objectives of ToFM b) description of the ToF resources (site and species) c) maps of the operational area d) silvicultural practises (clear cuts, selective cuts, thinning, replanting), harvesting cycle and methods. e) plans for monitoring growth of trees f) environmental and social impacts of ToFM operations. g) conservation of rare species and high conservation areas/ values h) pest, disease and weed control plan i) duration of the plan". <p>Compliance: Conformity</p> <p>Justification:</p> <p>The requirements for planning (2.1) require elements of the management plans that ensure full coverage of the TOF resources.</p> |
| 6.2.2 The standard requires that management plans shall take into account | YES | NCCF-STD-ToF |

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|--|-----------|---|
| the different uses or functions of the managed forest area. | | <p>Criterion 2.1: "Management Plan, should be area specific covering LMU ownership and tree species details, planting details, agriculture cropping pattern, harvesting regime, operations aimed at environmental protection and amenities and social safeguards. It should be prepared by the farmer/owner or jointly by a group of farmers, tree growers or professionals.</p> <p>Similarly, Management Plans for UTF should cover ownership & tree species details, monitoring mechanism of the tree health and removal of unhealthy/dying/dangerous plants and their replacement and operations for environmental protection and recreation".</p> <p>Indicator 2.1.2: "The management plan addresses the following elements:</p> <ul style="list-style-type: none"> a) objectives of ToFM b) description of the ToF resources (site and species) c) maps of the operational area d) silvicultural practises (clear cuts, selective cuts, thinning, replanting), harvesting cycle and methods. e) plans for monitoring growth of trees f) environmental and social impacts of ToFM operations. g) conservation of rare species and high conservation areas/ values h) pest, disease and weed control plan i) duration of the plan". <p>Criterion 2.2: "Management plan aims to maintain or increase the total quantum of growing stock (spatially or temporally) without affecting food security if notified by local/state government authorities, as well as social, economic, ecological and cultural well-being of the land owners".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The requirements for planning (2.1) require elements of the management plans that ensure fulfillment of different functions of the ToF.</p> |
| 6.2.3 The standard requires that management plans shall include at least a description of the current forest management unit, long-term objectives, and the average annual allowable cut, including its justification. | YES | <p>NCCF-STD-ToF</p> <p>Criterion 2.1: "Management Plan, should be area specific covering LMU ownership and tree species details, planting details, agriculture cropping pattern, harvesting regime, operations aimed at environmental protection and amenities and social safeguards. It should be prepared by the farmer/owner or jointly by a group of farmers, tree growers or professionals.</p> <p>Similarly, Management Plans for UTF should cover ownership & tree species details, monitoring mechanism of the tree health and removal of unhealthy/dying/dangerous plants and their replacement</p> |

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|----------------------------|-----------|--|
| | | <p>and operations for environmental protection and recreation".</p> <p>Indicator 2.1.2: "The management plan addresses the following elements:</p> <ul style="list-style-type: none"> a) objectives of ToFM b) description of the ToF resources (site and species) c) maps of the operational area d) silvicultural practises (clear cuts, selective cuts, thinning, replanting), harvesting cycle and methods. e) plans for monitoring growth of trees f) environmental and social impacts of ToFM operations. g) conservation of rare species and high conservation areas/ values h) pest, disease and weed control plan i) duration of the plan". <p>Criterion 2.7: Management plan contains procedures to monitor and assess the status of ToF resource and its periodicity, yield prediction, tracking and tracing system, PEFC certified claim & logo usage of the wood from LMU and management activities and their social and environmental impacts. Monitoring is conducted according to the provisions in the management plan.</p> <p>Indicator 2.7.1: Monitoring covers the following parameters:</p> <ul style="list-style-type: none"> a. Yield of all wood coming from ToF resource b. Growth rates, regeneration and health of the ToF resource c. Cost and productivity of the ToF resource management d. Environmental and social impacts of the management operations e. Structural/Composition changes in the flora and fauna, if any <p>Indicator 4.3.3: "ToFM determines the total quantum of wood that can be harvested from the LMU as per provisions of the Management Plan. ToFM shall define the Annual harvest under the sustainable harvest limits based on suitable parameters as justification and shall have documented information as evidence."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The requirements for planning (2.1) require elements of the management plans, including the description of ToF resources and long-term objectives. Criterion 2.7 requires monitoring of the yield and growth rates.</p> <p>Indicator 4.3.2 explicitly requires to define annual harvest volume with its justification.</p> |

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|---|-----------|--|
| 6.2.4 The standard requires that the annually allowable use of non-wood forest products shall be included in the management plan where forest management covers commercial use of non-wood forest products at a level which can have an impact on their long-term sustainability. | YES | <p>NCCF-STD-ToF</p> <p>Indicator 4.1.4: "ToFM shall also consider sustainable use of non-wood products, where ToFM covers commercial use of non-wood forest products at a level which can have an impact on their long-term sustainability.</p> <p>Note: Under the scope of this standard, only tree-based products e.g. standing tree and harvested logs can be sold with certified claim. Certification of Non-wood products shall be considered separately under Non-wood Forest resource certification standard.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirement for sustainable use of non-wood products with commercial utilisation. However, the Standard explicitly states that the Non-wood products shall not be sold with the certified claim as the NCCF is developing an alone standing standard for non-wood products.</p> |
| 6.2.5 The standard requires that management plans specify ways and means to minimise the risk of degradation and damage to natural ecosystems. | YES | <p>NCCF-STD-ToF</p> <p>Criterion 2.1: "Management Plan, should be area specific covering LMU ownership and tree species details, planting details, agriculture cropping pattern, harvesting regime, operations aimed at environmental protection and amenities and social safeguards. It should be prepared by the farmer/owner or jointly by a group of farmers, tree growers or professionals.</p> <p>Similarly, Management Plans for UTF should cover ownership & tree species details, monitoring mechanism of the tree health and removal of unhealthy/dying/dangerous plants and their replacement and operations for environmental protection and recreation".</p> <p>Indicator 2.1.2: "The management plan addresses the following elements:</p> <ul style="list-style-type: none"> a) objectives of ToFM b) description of the ToF resources (site and species) c) maps of the operational area d) silvicultural practises (clear cuts, selective cuts, thinning, replanting), harvesting cycle and methods. e) plans for monitoring growth of trees f) environmental and social impacts of ToFM operations. g) conservation of rare species and high conservation areas/ values h) pest, disease and weed control plan i) duration of the plan". <p>Criterion 2.7: "Management plan contains procedures to monitor and assess the status of ToF resource and its periodicity, yield prediction, tracking and tracing system,</p> |

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|---|-----------|---|
| | | <p>PEFC certified claim & logo usage of the wood from LMU and management activities and their social and environmental impacts. Monitoring is conducted according to the provisions in the management plan.”.</p> <p>Indicator 2.7.1 (Not applicable to NBA): “Monitoring covers the following parameters:</p> <ul style="list-style-type: none"> a. Yield of all wood coming from ToF resource b. Growth rates, regeneration and health of the ToF resource c. Cost and productivity of the ToF resource management d. Environmental and social impacts of the management operations e. Structural/Composition changes in the flora and fauna, if any”. <p>Criterion 3.1: “Measures are taken to maintain or improve the health and vitality of the LMU resource.</p> <p>Indicator 3.1.2: Measures are adopted to avoid or minimise the risk of degradation of land.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The requirements for planning (2.1, 2.7) require assessment as well as monitoring of environmental and social impacts. Indicator 3.1.2 then requires measures to avoid or minimize the risk of degradation of land.</p> |
| 6.2.6 The standard requires that management plans shall take into account the results of scientific research. | YES | <p>NCCF-STD-ToF</p> <p>Indicator 2.1.3: “Management plan shall take into account the results of scientific research, specially regarding Intensive ToF management and wherever applicable at group level. Management shall also contribute to research activities and data collection needed for sustainable management or support relevant research activities carried out by other organizations, as appropriate”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires that management plans shall take into account the results of scientific research.</p> |
| 6.2.7 The standard requires that a summary of the management plan, appropriate to the scope and scale of forest management, shall be publicly available and shall include information on the general objectives and forest management principles. | YES | <p>NCCF-STD-ToF</p> <p>Indicator 2.1.6: “Summary of the management plan (preferably in local language) is available”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard require public availability of management plans (2.1.6).</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 | YES | <p>NCCF-STD-ToF</p> <p>Indicator 2.1.6: “Summary of the management plan (preferably in local language) is available”.</p> |

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|--|-----------|--|
| applicable legislation or for the protection of cultural sites or sensitive natural resource features. | | Compliance: Conformity Justification: The Standard require public availability of management plans (2.1.4) and does not apply exemption for confidential information. |
| 6.3 Compliance requirements | | |
| 6.3.1 Legal compliance | | |
| <p>6.3.1.1 The standard requires that the organisation shall identify and have access to the legislation applicable to its ToF management and determine how these compliance obligations apply to the organisation.</p> <p>Note: Only where TOF is within the scope of a Country's FLEGT Voluntary Partnership agreement (VPA) between the European Union and the producing country, is the "legislation applicable to TOF area" defined by the VPA agreement.</p> | YES | NCCF-STD-ToF <p>Criterion 1.1: "Trees outside Forests Management (ToFM) complies with all applicable national, state, and local legislations and rules pertaining to forest and revenue lands ; and the payment of applicable royalties and taxes as well as international treaties and regulations."</p> <p>Indicator 1.1.1: "Compliance with all applicable central, state and local laws, rules and regulations be demonstrated".</p> <p>Indicator 1.1.2: "Compliance to these legislations shall include, but not limit to, agriculture, forests, trees 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; crop damage compensation, anti-corruption."</p> <p>Indicator 1.1.3 "Organisation shall identify and have access to the legislations applicable to its management and determine how these compliance obligations apply to the organisation".</p> Compliance: Conformity Justification: The Standard requires identification of the relevant regulations (1.1.3). |
| <p>6.3.1.2 The standard requires that the organisation shall comply with applicable local, national and international legislation on ToF management, including but not limited to agriculture and agroforestry, 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; crop damage compensation, anti-corruption and the payment of applicable royalties and taxes.</p> | YES | NCCF-STD-ToF <p>Criterion 1.1: "Trees outside Forests Management (ToFM) complies with all applicable national, state, and local legislations and rules pertaining to forest and revenue lands ; and the payment of applicable royalties and taxes as well as international treaties and regulations."</p> <p>Indicator 1.1.1: "Compliance with all applicable central, state and local laws, rules and regulations be demonstrated".</p> <p>Indicator 1.1.2: "Compliance to these legislations shall include, but not limit to, agriculture, forests, trees 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; crop damage compensation, anti-corruption."</p> <p>Indicator 1.1.6: Evidence for payments of taxes, fee and other charges..."</p> |

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|--|-----------|---|
| | | Compliance: Conformity Justification: The Standard requires compliance with applicable legislation and defines areas of the applicable legislation that satisfies the PEFC requirements (1.1.1, 1.1.2, 1.1.6). |
| 6.3.1.3 The standard requires that where no anti-corruption legislation exists, the organisation must take alternative anti-corruption measures appropriate to the risk of corruption. | YES | <p>Indicator 1.1.2: "Compliance to these legislations shall include, but not limit to, agriculture, forests, trees 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; crop damage compensation, anti-corruption."</p> <p>In India, bribery and corruption are governed by several statutes: The Prevention of Corruption Act, 1988 (PC Act) is the primary legislation penalising bribery and corruption in India. It specifies acts that constitute offences and provides for prosecution for those offences. Offences under the PC Act are also predicate offences under the Prevention of Money Laundering Act, 2002 (PMLA) and may also be benami (i.e. conceal the identity of the person taking the bribe). Bribes may also be stashed abroad by the recipient. Therefore, the Legislature also enacted the Prohibition of Benami Property Transactions Act, 1988 (Benami Act) which prohibits benami transactions and the Black Money (Undisclosed Foreign Income and Assets) and Imposition of Tax Act, 2015 (Black Money Act) which is aimed at recovering monies illegally stashed abroad (including bribes). Separately, any gratification, gift, offer or promise which interferes with the free exercise of a person's electoral right or with a person's decision to contest an election is punishable under the Indian Penal Code, 1860 and the Representation of People Act, 1951 (RP Act)²³.</p> <p>India has ratified the following conventions:</p> <ul style="list-style-type: none"> a. United Nations Convention against Corruption b. United Nations Convention against Transnational Organised Crime. <p>Investigations into allegations of bribery are quite common and are usually initiated on the discovery of violations by the government, public departments, vigilance departments, whistle blowers and private complaints. A public servant will also face departmental inquiries on charges of bribery and criminal misconduct resulting in civil and, or, criminal consequences of bribery and corruption. Per the National Crime Records Bureau Report of 2019 published by the Ministry of Home Affairs, state police departments have registered a total of 4,062, 4,129 and 4,243 cases of corruption in years 2017, 2018 and 2019 respectively while the number of corruption cases registered by the CBI stand at 632, 460, 419 and 425 for years 2017, 2018, 2019 and 2020 respectively. Additionally, 39 cases were registered in January 2021 alone by the CBI. A total of 1,427 complaints were received in financial year 2019-20 and about 95</p> |

²³ <https://www.legal500.com/guides/chapter/india-bribery-corruption/?export-pdf>

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|---|-----------|--|
| | | <p>complaints have been received up till January 2021 under the Lokpal Act²⁴.</p> <p>The Corruption Perception Index for India for 2020 (Transparency International) is 40 and India ranks as 85 out of 180 countries.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>India has anticorruption legislation in place and the Standard requires compliance with the anti-corruption legislation (1.1.2).</p> |
| 6.3.1.4 The standard requires that measures shall be implemented to address protection of the forest from unauthorised activities such as illegal logging, illegal land use, illegally initiated fires, and other illegal activities. | YES | <p>NCCF-STD-ToF</p> <p>Criterion 1.2: "ToFM shall have adequate provisions for protection from illegal activities such as illegal logging, illegal land use including encroachments, illegal/malicious fires, other illegal activities".</p> <p>Indicator 1.2.1: "Sufficient resources and measures (infrastructure, financial and human) are available and in place, to ensure illegal activities do not take place".</p> <p>Indicator 1.2.2: "Remedial, measures as applicable are taken and illegal activity if any are recorded".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires protection of forests from illegal activities of third parties, providing resources for those activities, remedial actions and records keeping (1.2).</p> |
| 6.3.2 Legal, customary and traditional rights related to the forest land | | |
| <p>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.</p> <p>Note: Guidance for the handling of tenure arrangements can be obtained from the FAO Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security.</p> | YES | <p>NCCF-STD-ToF</p> <p>Criterion 1.3: "ToFM demonstrates clear and secure ownership, tenure, land leasing or use rights of the LMU".</p> <p>Indicator 1.3.1: "Documents of clear and secure ownership, tenure or use rights associated with the LMU are available".</p> <p>Indicator 1.3.2: "Disputes over land, tenure and use rights are resolved legally or through participatory/ conciliatory methods".</p> <p>Indicator 1.3.3: "Records of disputes and their mode of resolution (along with outcomes), are maintained".</p> <p>Indicator 1.3.4: "LMU boundaries are clearly demarcated and visible on the field".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes a requirement for tenure, land leasing or use rights. The Standard also defines</p> |

²⁴ <https://www.legal500.com/guides/chapter/india-bribery-corruption/?export-pdf>

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|---|-----------|--|
| | | <p>requirements for dispute resolution over the land rights (1.3.1-1.3.4).</p> <p>The customary and traditional rights are covered by the term “use rights”.</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> | NO | <p>NCCF-STD-ToF</p> <p>Criterion 1.3: “ToFM demonstrates clear and secure ownership, tenure, land leasing or use rights of the LMU”.</p> <p>Note: suitability of ToF STD regarding indigenous community: India has ratified ILO convention, The Govt. continues to deny the term and concept of “indigenous peoples” claiming that all Indians are indigenous. Though India has enacted The Forest Rights Act (FRA) 2006 which recognizes the rights of the forest dwelling tribal communities and other traditional forest dwellers to forest resources, on which these communities were dependent for a variety of needs, including livelihood, habitation and other socio-cultural needs. Since this law is more about forest dwelling communities and their usage rights within forests, it is out of scope of ToF certification standard as it is applicable for tree management outside Forest”.</p> <p>Indicator 1.3.1: “Documents of clear and secure ownership, tenure or use rights associated with the LMU are available”.</p> <p>Indicator 1.3.2: “Disputes over land, tenure and use rights are resolved legally or through participatory/ conciliatory methods”.</p> <p>Indicator 1.3.3: “Records of disputes and their mode of resolution (along with outcomes), are maintained”.</p> <p>Indicator 1.3.4: “LMU boundaries are clearly demarcated and visible on the field”.</p> <p>Compliance: Minor non-conformity</p> <p>Justification:</p> <p>The Standard includes a requirement for tenure, land leasing or use rights. The Standard also defines requirements for dispute resolution over the land rights.</p> <p>However, the Standard does not include an explicit requirement for indigenous peoples. A note to the requirement 1.3 states that the issue indigenous people in India is only relevant to the management of forests with the reference to the Forest Rights Act (FRA) 2006.</p> <p>India has not ratified the ILO Convention 169²⁵ and voted in favour of the UN Declaration on the Rights of Indigenous Peoples, 2007²⁶.</p> <p>India is not using the term “indigenous people”. Instead, the Indian Constitution calls the aboriginal tribal groups “Scheduled Tribes” (also known as the “Adivasi”). It is reported that the Schedule Tribes represent 8.6 % of the</p> |

²⁵ https://www.ilo.org/dyn/normlex/en/f?p=1000:11200:0::NO:11200:P11200_COUNTRY_ID:102691

²⁶ <https://www.un.org/development/desa/indigenouspeoples/declaration-on-the-rights-of-indigenous-peoples.html>

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|--|-----------|---|
| | | <p>Indian population²⁷. More than half of the tribal population resides in six states of Northeast India.: Madhya Pradesh, Chhattisgarh, Maharashtra, Orissa, Jharkhand and Gujarat. The Northeast of India has a particularly heavy tribal element. These ancient aboriginal peoples tend to live in isolated communities in hills and forestlands, far from urban centres²⁸. The scheduled tribes living in the Northeast greatly depend on land and forest for their livelihood through agriculture particularly shifting cultivation, food gathering and hunting²⁹.</p> <p>The omission of specific requirements relating to indigenous peoples (scheduled tribes) in India is largely justified and the issue of indigenous peoples have only limited effect on the management of Trees outside Forests, taking into account the following facts:</p> <ul style="list-style-type: none"> e) Most of the scheduled tribes are forest dependent communities, using forest resources for their livelihood; Their rights within the forest boundaries are well regulated and protected by legislation, Forest Rights Act (FRA) 2006. The issue is outside the scope of the ToF management; f) ToF management within the Indian context is mainly focused on small holders which are not affected by the scheduled tribes' rights; g) Scheduled Tribes rights are subject to governmental regulations³⁰ activities and concerns. It has created a special Ministry of Tribal Affairs³¹ and National Commission for Scheduled Tribes³². h) Issues relating to customary rights or disputes over the land use and tenure rights relating to the scheduled tribes can be resolved by the Criterion 1.3 of the Standard. |
| 6.3.2.3 The standard requires that forest practices and operations shall respect human rights as defined by the Universal Declaration on Human Rights. | YES | <p>NCCF-STD-ToF</p> <p>Indicator 1.1.4: "ToF management practices and operations, taken by organization shall respect human rights as defined by the Universal Declaration on Human Rights".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires that management shall respect the Universal Declaration on Human Rights (1.1.4).</p> |

²⁷ <https://www.un.org/development/desa/indigenouspeoples/declaration-on-the-rights-of-indigenous-peoples.html>

²⁸ [Indigenous Peoples of India – Indigenous Peoples Literature \(wordpress.com\)](https://www.wordpress.com/indigenous-peoples-of-india/)

²⁹

https://www.academia.edu/75283445/Land_Agriculture_and_Livelihood_of_Scheduled_Tribes_in_North_East_India

³⁰ THE SCHEDULED CASTES AND THE SCHEDULED TRIBES (PREVENTION OF ATROCITIES) ACT, 1989

³¹ [Ministry of Tribal Affairs - Government of India](https://www.ministryoftribalaffairs.gov.in/)

³² [National Commission for Scheduled Tribes | Government of India \(ncst.nic.in\)](https://www.ncst.nic.in/)

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|--|-----------|--|
| 6.3.3 Fundamental ILO conventions | | |
| <p>6.3.3.1 The standard requires that forest practices and operations shall comply with fundamental ILO conventions.</p> <p>Note: In countries where the fundamental ILO conventions have been ratified, the requirements of 6.3.3.1 apply. In countries where a fundamental convention has not been ratified and its content is not covered by applicable legislation, specific requirements shall be included in the forest management standard.</p> | YES | <p>NCCF-STD-ToF</p> <p>Criterion 5.3: "ToFM ensures safe working environment commensurate to the operational requirements, having no adverse effects on the health and well-being of workers. International Labour Organization (ILO) Conventions are respected and implemented as applicable".</p> <p>Indicator 5.3.4: ToFM shall respect and implement the eight fundamental conventions of all applicable ILO.</p> <p>Note: India has ratified six out of these eight core conventions. The other two, regarding freedom of association and right to organise, are available to workers in India by means of constitutional provision".</p> <p>India has ratified 6 out of 8 ILO fundamental conventions. The conventions C087 and C098 that relate to freedom of association have not been ratified by India³³.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>India has ratified 6 out of 8 fundamental ILO Conventions. This opens a risk of whether or not the non-ratified Conventions (C087, C098) have been implemented into Indian legislation.</p> <p>The Standard explicitly requires compliance with all 8 fundamental ILO Conventions, including those that have not been ratified (5.3.4).</p> |
| 6.3.4 Health, safety and working conditions | | |
| <p>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.</p> | YES | <p>NCCF-STD-ToF</p> <p>Criterion 5.3: "ToFM ensures safe working environment commensurate to the operational requirements, having no adverse effects on the health and well-being of workers. International Labour Organization (ILO) Conventions are respected and implemented as applicable".</p> <p>Indicator 5.3.1: "A safe working environment shall be fostered/maintained commensurate to the operational requirements:</p> <ul style="list-style-type: none"> a. Complying with all relevant workplace health and safety laws b. Adopting working conditions that do not endanger health or safety c. Workers are made aware of health and safety aspects". <p>Indicator 5.3.2: "Records for accident, workplace injury, etc. along with remedial measures are maintained".</p> <p>Indicator 5.3.3: "Workers are made aware about the risks involved and the possible preventive measures".</p> <p>Indicator 5.3.5: "Working conditions shall be regularly monitored and adapted as necessary".</p> |

³³ [Ratifications of ILO conventions: Ratifications for India](#)

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|--|-----------|---|
| | | Compliance: Conformity Justification: The Standard requires safe working environment that do not endanger workers' health; identification of the risks and workers being informed about them; and preventive measures to mitigate the risks (5.3.1 – 5.3.5). |
| <p>6.3.4.2 The standard requires that working conditions shall be safe, and guidance and training in safe working practices shall be provided to all those assigned to a task in forest operations. Working hours and leave shall comply with national laws or applicable collective agreements.</p> <p>Note: Guidance for specifying national standards can be obtained from the ILO Code of Good Practice: Safety and Health in Forestry Work.</p> | YES | NCCF-STD-ToF Criterion 5.3: "ToFM ensures safe working environment commensurate to the operational requirements, having no adverse effects on the health and well-being of workers. International Labour Organization (ILO) Conventions are respected and implemented as applicable". Indicator 5.3.1: "A safe working environment shall be fostered/maintained commensurate to the operational requirements: a. Complying with all relevant workplace health and safety laws b. Adopting working conditions that do not endanger health or safety c. Workers are made aware of health and safety aspects". Indicator 5.3.2: "Records for accident, workplace injury, etc. along with remedial measures are maintained". Indicator 5.3.3: "Workers are made aware about the risks involved and the possible preventive measures". Indicator 5.3.5: "Working conditions shall be regularly monitored and adapted as necessary". Criterion 5.2: "ToFM ensures payment of wages to workers in accordance with all relevant labour laws, rules and regulations. There is no discrimination among workers based on religion, sex, caste, race, gender, region". Indicator 5.2.1: "All workers shall be paid as per applicable legal wage schedules, that may be any one of the following: a. Minimum wages prescribed under the Minimum Wages Act, 1948 b. State Specific Wage Rates c. Piece Wage Rates/Volume based rates as per State notifications d. MGNREGA Wage Rates e. Wage agreements with workers (formal, informal, verbal, etc. all such agreements are recorded)". Indicator 5.2.2: "There shall be no discrimination among workers based on sex, caste, religion, gender, region, race, etc." Indicator 5.2.3: "Equal wages are paid for equal works". Indicator 5.2.4: "Hiring or contracting children below 14 years of age is not permitted". |

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|--|-----------|---|
| | | <p>Indicator 5.2.5: "The workers are communicated working hours, wage rates, salaries and other benefits".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires safe working environment that do not endanger workers' health; workers shall be aware of the health and safety aspects. The Standard makes also reference to all relevant health and safety regulations (5.3).</p> <p>The Standard requires wages to be paid in accordance with the legal wage schedule (5.2).</p> |
| <p>6.3.4.3 The standard requires that wages of local and migrant forest workers as well as of contractors and other operators operating in PEFC-certified areas shall meet or exceed at least legal, industry minimum standards or, where applicable, collective bargaining agreements.</p> <p>Note: Where wages are below the living wage of a country, steps should be taken to attain increased wages towards a living wage level over time in addition to increases for inflation.</p> | YES | <p>NCCF-STD-ToF</p> <p>Indicator 5.2.1: "All workers shall be paid as per applicable legal wage schedules, that may be any one of the following:</p> <ul style="list-style-type: none"> a. Minimum wages prescribed under the Minimum Wages Act, 1948 b. State Specific Wage Rates c. Piece Wage Rates/Volume based rates as per State notifications d. MGNREGA Wage Rates e. Wage agreements with workers (formal, informal, verbal, etc. all such agreements are recorded)" <p>Indicator 5.2.2: "There shall be no discrimination among workers based on sex, caste, religion, gender, region, race, etc."</p> <p>Indicator 5.2.3: "Equal wages are paid for equal works and there shall be no harassment at the workplace. Equal opportunity shall be promoted".</p> <p>Indicator 5.2.4: "Hiring or contracting children below 14 years of age is not permitted".</p> <p>Indicator 5.2.5: "The workers are communicated working hours, wage rates, salaries and other benefits".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires the legal wage schedule to be applied to all workers regardless of their origin (5.2). The Standard also includes requirements prohibiting any type of discrimination (sex, caste, religion, gender, region, race, etc), (5.2.2); requires equal wage for equal work (5.2.3) and communication of wage, working hours, salaries and other benefits to workers (5.2.5).</p> |
| <p>6.3.4.4 The standard requires that the organisation is committed to equal opportunities, non-discrimination and freedom from workplace harassment. Gender equality shall be promoted.</p> | YES | <p>NCCF-STD-ToF</p> <p>Criterion 5.2: "ToFM ensures payment of wages to workers in accordance with all relevant labour laws, rules and regulations. There is no discrimination among workers based on religion, sex, caste, race, gender, region".</p> |

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|---|-----------|---|
| | | <p>Indicator 5.2.1: "All workers shall be paid as per applicable legal wage schedules, that may be any one of the following:</p> <ul style="list-style-type: none"> a. Minimum wages prescribed under the Minimum Wages Act, 1948 b. State Specific Wage Rates c. Piece Wage Rates/Volume based rates as per State notifications d. MGNREGA Wage Rates e. Wage agreements with workers (formal, informal, verbal, etc. all such agreements are recorded)" <p>Indicator 5.2.2: "There shall be no discrimination among workers based on sex, caste, religion, gender, region, race, etc."</p> <p>Indicator 5.2.3: Equal wages are paid for equal works and there shall be no harassment at the workplace. Equal opportunity shall be promoted".</p> <p>Indicator 5.2.4: "Hiring or contracting children below 14 years of age is not permitted".</p> <p>Indicator 5.2.5: "The workers are communicated working hours, wage rates, salaries and other benefits".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard also includes requirements prohibiting any type of discrimination (sex, caste, religion, gender, region, race, etc) (5.2.2); requires equal wage for equal work, non-discrimination and no harassment at the work place (5.2.3) and communication of wage, working hours, salaries and other benefits to workers (5.2.5).</p> |
| 7. Support | | |
| 7.1 Resources | | |
| 7.1.1 The standard requires that the organisation shall determine and provide the resources needed for the establishment, implementation, maintenance and continual improvement of the sustainable forest management system. | YES | <p>NCCF-STD-ToF</p> <p>Indicator 2.1.5: "Adequate infrastructure, finances, human and other resources are available for proper implementation of the management plan".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires availability of resources needed for planning, implementing, maintenance and continual improvement of actions required by the standard (2.1.5).</p> |
| 7.2 Competence | | |
| 7.2.1 The standard requires that land managers, contractors, employees and land owners shall be provided with sufficient information and kept up-to-date through continuous training in relation to agroforestry, good agriculture practices, and forestry practices, as a precondition for | YES | <p>NCCF-STD-ToF</p> <p>Indicator 2.5.3: "Managers and workers are duly trained for their role in implementing the management plan. The records of trainings are maintained".</p> <p>Indicator 2.8.4: "ToFM provides training to farmers and workers for the implementation of the new procedures</p> |

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|--|-----------|---|
| all management planning and practices described in this benchmark. | | <p>developed based on the monitoring results. The trainings are in consonance with the requirements in Indicator 2.5.3".</p> <p>Indicator 5.4.1: "Workers are encouraged to attend trainings, workshops and capacity building programs organized by various organisations".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires all employees of the owner/manager to attend training (2.5.3, 5.4.1) and the owner/manager is also required to provide training on new procedures as an outcome of a monitoring programme (2.8.4).</p> |
| 7.3 Communication | | |
| 7.3.1 The standard requires that effective communication and consultation with local communities, indigenous peoples and other stakeholders relating to sustainable forest management shall be provided. | YES | <p>NCCF-STD-ToF</p> <p>Criterion 5.4: "Access to information on good management practices through knowledge sharing activities".</p> <p>Indicator 5.4.2: "Appropriate mechanism to encourage effective communication and consultation with stakeholders for knowledge sharing exists".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires the owner / manager to establish an effective communication and consultation with stakeholders (5.4.2).</p> |
| 7.4 Complaints | | |
| 7.4.1 The standard requires that appropriate mechanisms are in place for resolving complaints and disputes relating to forest management operations, land use rights and work conditions. | YES | <p>NCCF-STD-ToF</p> <p>Indicator 1.3.2: "Disputes over land, tenure and use rights are resolved legally or through participatory/ conciliatory methods".</p> <p>Indicator 2.9.1: "Organisation shall also have appropriate mechanisms in place for resolving complaints and disputes relating to forest management operations, land use rights and work conditions".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes provisions for handling complaints and disputes relating to the land, tenure and use rights (1.3.2) and other management issues (2.9.1).</p> |
| 7.5 Documented Information | | |

| PEFC benchmark requirement | YES / NO* | Reference to system documentation (including quotation of relevant text) |
|--|-----------|--|
| 7.5.1 The standard requires that the organisation's management system shall include documented information required by the standard and determined by the organisation as being necessary for the effectiveness of the sustainable forest management system. | YES | <p>Indicator 2.1.1: There is a written management plan for the LMU, with management objectives, Good Agricultural Practises (GAP) and Standard Operating Procedures (SOPs), actions and measures.</p> <p>Indicator 2.10.1: "ToFM shall include documented information required by the standard and determined by the organisation as being necessary for the effectiveness of the sustainable ToF management system".</p> <p>Indicator 2.10.2: "The standard requires that the documented information is relevant, and updated as appropriate, to the activities of the organisation".</p> <p>Individual indicators specify documentation or records that shall be kept or made available to demonstrate compliance with the Standard.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for documented information and its management (2.10). In addition, specify documentation or records that shall be kept or made available to demonstrate compliance with the Standard.</p> |
| 7.5.2 The standard requires that the documented information is relevant, and updated as appropriate, to the activities of the organisation. | YES | <p>NCCF-STD-ToF</p> <p>Indicator 2.10.1: "ToFM shall include documented information required by the standard and determined by the organisation as being necessary for the effectiveness of the sustainable ToF management system".</p> <p>Indicator 2.10.2: "The standard requires that the documented information is relevant, and updated as appropriate, to the activities of the organisation".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for documented information and its management (2.10).</p> |

| | | |
|--|-----|---|
| 8. Operation | | |
| 8.1 Criterion 1: Maintenance or appropriate enhancement of forest resources and their contribution to the global carbon cycle | | |
| <p>8.1.1 The standard requires that management shall aim to maintain or increase the cover, value, and/or diversity of trees in the landscape and their related ecosystem services and maintain or enhance the economic, ecological, cultural and social values and are aligned with existing land-use regimes.</p> <p>Note: When the requirement is not achievable within individual, ToF-extensive areas, it can be considered at landscape level.</p> | YES | <p>Criterion 2.2 (Not applicable to NBA): "Management plan aims to maintain or increase the total quantum of growing stock (spatially or temporally) without affecting food security if notified by local/state government authorities, as well as social, economic, ecological and cultural well-being of the land owners".</p> <p>Indicator 2.2.1: "Management Plan contains actions, strategies and measures to maintain or increase the quantum of growing stock".</p> <p>Indicator 2.2.2: "Food- production or agricultural activities are not negatively affected by ToFM activities.</p> <p>Note: For verification National/State/local food-grain policies or orders to be referred".</p> <p>Indicator 2.2.3: "The management plan includes measures to ensure that overall economic viability, social and environmental well-being is not negatively affected".</p> <p>Indicator 6.1.3: "Indicator 6.1.3: Rare, threatened and endangered plant and animal species shall be conserved. In addition, plant species as well as those with historical, cultural and spiritual significance shall also be conserved".</p> <p>Indicator 6.1.4: "Management systems, including traditional systems, that support conservation of the above identified, are followed".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires as a part of the management planning to maintain or increase quantity of growing stock without harming other functions of the ToF (2.2). The Standard also includes requirements to protect other social and environmental functions of the ToF (5, 6).</p> |
| <p>8.1.2 The standard requires that management shall maintain or enhance ToF resources and their capacity to capture and store carbon in the medium and long term by balancing harvesting and growth rates, and by minimising direct or indirect damage to ecosystem services.</p> | YES | <p>NCCF-STD-ToF</p> <p>Criterion 2.2: "Management plan aims to maintain or increase the total quantum of growing stock (spatially or temporally) without affecting food security if notified by local/state government authorities, as well as social, economic, ecological and cultural well-being of the land owners".</p> <p>Indicator 2.2.1: "Management Plan contains actions, strategies and measures to maintain or increase the quantum of growing stock".</p> <p>Indicator 2.6.4 (Only applicable in case of GHG projects, not applicable to NBA): "ToFM endeavours to assess the net carbon addition to the carbon stock, in terms of:</p> <p>a) Carbon sequestered in terms of increase in the growing stock</p> <p>b) Quantification of net emission reductions at LMU level".</p> <p>Indicator 2.7.1: "Monitoring covers the following parameters:</p> |

| | | |
|--|-----|---|
| | | <ul style="list-style-type: none"> a. Yield of all wood coming from ToF resource b. Growth rates, regeneration and health of the ToF resource c. Cost and productivity of the ToF resource management d. Environmental and social impacts of the management operations e. Structural/Composition changes in the flora and fauna, if any". <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires maintenance of the growing stock (2.2.1), increase of the growing stock and a measure to increase carbon sequestration (2.6.4) and monitoring of growths and yield (2.7.1).</p> |
| 8.1.3 The standard requires that climate positive practices in management operations, such as greenhouse gas emission reductions and efficient use of resources shall be encouraged. | YES | <p>NCCF-STD-ToF</p> <p>Indicator 2.6.4: "ToFM endeavours to assess the net carbon addition to the carbon stock, in terms of:</p> <ul style="list-style-type: none"> a) Carbon sequestered in terms of increase in the growing stock b) Quantification of net emission reductions at LMU level". <p>Indicator 2.6.5: "ToFM shall encourage Climate positive practices in management operations, such as greenhouse gas emission reductions and efficient use of resources".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes specific requirements increase of carbon sequestration and emissions reduction (2.6.4) support to climate positive activities (2.6.5).</p> |
| 8.1.4 The standard requires that forest conversion to ToF shall not occur unless in justified circumstances where the conversion. | | |
| TOF areas established by a forest conversion after 31 December 2010 in other than "justified circumstances" do not meet the requirement and are not eligible for certification. | YES | <p>NCCF-STD-ToF</p> <p>Indicator 1.1.1: "Compliance with all applicable central, state and local laws, rules and regulations be demonstrated".</p> <p>Indicator 1.3.5: "Scenarios such as Forest conversion to ToF plantations, prior to 1994 and/or conversion of ecologically important non-forest ecosystems into ToF plantations, shall not occur unless in justified circumstances where the conversion:</p> <ul style="list-style-type: none"> 1. Is in compliance with applicable national, regional and/or state legislations, have evidence regarding approval from authority and is result of land use planning governed by Govt. and any other authority and established based on decision making including consultation with affected stakeholders 2. Entails small proportion (no greater than 5 %) of original type within the certified area; |

| | | |
|--|-----|---|
| | | <p>3. Does not have negative impacts on ecologically important forest or non-forest areas or, culturally and socially significant areas, or other protected areas;</p> <p>4. Doesn't destroy areas of significantly high carbon stock;</p> <p>5. Makes a contribution to long-term conservation, economic, and social benefits.</p> <p>Note 1: Converted areas to ToF Without stipulated considerations of above, cannot be certified"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires compliance with legislation (1.1.1) and prohibits forest conversion to ToF plantations unless in justified circumstances (1.3.5). Those circumstances are identical to the PEFC requirement 8.1.4. The ToF plantation that does not meet the requirement is not eligible for the certification (1.3.5).</p> |
| <p>8.1.5 The standard requires that conversion of ecologically important non-forest ecosystems to TOF areas shall not occur unless in justified circumstances.</p> <p>TOF areas established by a conversion after 31 December 2010 in other than "justified circumstances" do not meet the requirement and are not eligible for certification.</p> | | |
| <p>TOF areas established by a conversion after 31 December 2010 in other than "justified circumstances" do not meet the requirement and are not eligible for certification.</p> | YES | <p>NCCF-STD-ToF</p> <p>Indicator 1.1.1: "Compliance with all applicable central, state and local laws, rules and regulations be demonstrated".</p> <p>Indicator 1.3.5: "Scenarios such as Forest conversion to ToF plantations, prior to 1994 and/or conversion of ecologically important non-forest ecosystems into ToF plantations, shall not occur unless in justified circumstances where the conversion:</p> <p>1. Is in compliance with applicable national, regional and/or state legislations, have evidence regarding approval from authority and is result of land use planning governed by Govt. and any other authority and established based on decision making including consultation with affected stakeholders</p> <p>2. Entails small proportion (no greater than 5 %) of original type within the certified area;</p> <p>3. Does not have negative impacts on ecologically important forest or non-forest areas or, culturally and socially significant areas, or other protected areas;</p> <p>4. Doesn't destroy areas of significantly high carbon stock;</p> <p>5. Makes a contribution to long-term conservation, economic, and social benefits.</p> <p>Note 1: Converted areas to ToF Without stipulated considerations of above, cannot be certified"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires compliance with legislation (1.1.1) and prohibits conversion ecologically important non-forest</p> |

| | | |
|---|-----|--|
| | | ecosystems to ToF plantations unless in justified circumstances (1.3.5). Those circumstances are identical to the PEFC requirement 8.1.5. The ToF plantation that does not meet the requirement is not eligible for the certification (1.3.5). |
| 8.2 Criterion 2: Maintenance of forest ecosystem health and vitality | | |
| 8.2.1 The standard requires that health and vitality of ToF areas shall be maintained or enhanced and degraded lands shall be rehabilitated wherever and as far as economically feasible, by making best use of landscape features, natural processes and processes and using preventive biological measures. | YES | <p>NCCF-STD-ToF</p> <p>Criterion 3.1: "Measures are taken to maintain or improve the health and vitality of the LMU resource".</p> <p>Indicator 3.1.1: "Measures are taken to make use of natural mechanisms as applicable viz regeneration, biological control of weeds and diseases, to maintain and enhance the health and vitality of ToF resource".</p> <p>Indicator 3.1.2: "Measures are adopted to avoid or minimise the risk of degradation of land".</p> <p>Indicator 3.1.3: "The rehabilitation of degraded lands is encouraged through measures such as soil and water conservation, control of grazing and fire, appropriate agri-silvicultural practices. Tree planting activities shall promote and contribute to the improvement and restoration of ecological connectivity".</p> <p>Indicator 3.1.4: "Successful regeneration shall be ensured through natural regeneration or planting that is adequate to ensure the quantity and quality of the ToF resources".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements relating to the forest health and vitality (3.1); requires measures to strengthen natural processes (3.1.1); minimisation of degradation risk (3.1.2), rehabilitation of degraded lands (3.1.3) and successful regeneration (8.1.4).</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 TOF area. | YES | <p>NCCF-STD-ToF</p> <p>Criterion 3.2: "In agroforests, apart from economic and environmental consideration, tree species suitable to the site are planted.</p> <p>In UTF, additional focus is on the recreational, amenity, aesthetic and pollution-control role of trees".</p> <p>Indicator 3.2.1: "In agroforests tree species planted are suitable to site conditions including edaphic conditions, water conservation, and the adjoining crops, as far as possible".</p> <p>Indicator 3.2.2: "Native species that are well-adapted or suitable to site conditions shall be preferred. Only those introduced species, provenances or varieties shall be used whose impacts on the ecosystem and on the genetic integrity of native species and local provenances have been scientifically evaluated, and if negative impacts can be avoided or minimised".</p> <p>Indicator 3.2.3: "Indicator 3.2.3: The invasive and disease carrying/prone tree species, harmful to the agricultural crop shall not be selected".</p> |

| | | |
|---|-----|---|
| | | <p>Indicator 3.2.4: "In UTF, tree species selection is based on the recreational, amenity, aesthetic and pollution control role and values of trees".</p> <p>Indicator 2.7.1: "Monitoring covers the following parameters:</p> <ul style="list-style-type: none"> a. Yield of all wood coming from ToF resource b. Growth rates, regeneration and health of the ToF resource c. Cost and productivity of the ToF resource management d. Environmental and social impacts of the management operations e. Structural/Composition changes in the flora and fauna, if any". <p>Indicator 5.1.1: "Establishment of mixture of tree species, agricultural crops and animals that are beneficial to local people is encouraged".</p> <p>Indicator 5.1.2: "In UTF mixture of tree species providing multiple environmental and social benefits is encouraged".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires genetic tree species composition that is adapted to the site (3.2), mixture of tree species, agriculture crops and animals (5.1) and requires monitoring of fauna and flora structure and composition in the management unit (2.7.1).</p> |
| 8.2.3 The standard requires that use of fire shall be limited to regions where fire is an essential tool in forest management for regeneration, wildfire protection and habitat management or a recognized practice of indigenous peoples. In these cases, adequate management and control measures shall be taken. | YES | <p>NCCF-STD-ToF</p> <p>Indicator 3.1.5: "Indicator 3.1.5 "Use of fire" shall be limited to regions where fire is an essential tool in the management for regeneration, wildfire protection and habitat management. In these cases, adequate management and control measures shall be taken.".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires makes limitation to the use of fire as the management technique and requires proper management and control (3.1.5).</p> |
| 8.2.4 The standard requires that appropriate TOF management practices shall use tree, crop and animal species and provenances that are suited to the site conditions or the use of tending, harvesting and transport techniques that minimise tree and/or soil damages shall be applied. | YES | <p>NCCF-STD-ToF</p> <p>Criterion 3.2: "In agroforests, apart from economic and environmental consideration, tree species suitable to the site are planted.</p> <p>In UTF, additional focus is on the recreational, amenity, aesthetic and pollution-control role of trees".</p> <p>Indicator 3.2.1: "In agroforests tree species planted are suitable to site conditions including edaphic conditions, water conservation, and the adjoining crops, as far as possible".</p> <p>Indicator 3.2.2: "Native species that are well-adapted or suitable to site conditions shall be preferred. Only those introduced species, provenances or varieties shall be used whose impacts on the ecosystem and on the genetic integrity of native species and local provenances have</p> |

| | | |
|---|-----|---|
| | | <p>been scientifically evaluated, and if negative impacts can be avoided or minimised".</p> <p>Indicator 3.2.4: "The invasive and disease carrying/prone tree species, harmful to the agricultural crop shall not be selected".</p> <p>Indicator 3.2.4: "In UTF, tree species selection is based on the recreational, amenity, aesthetic and pollution control role and values of trees".</p> <p>Criterion 4.4: "ToFM ensures that the tending, harvesting and transport operations cause no or minimal adverse impact on environment and property of others".</p> <p>Indicator 4.4.1: "ToFM ensures that tending and harvesting operations minimize wastage and damage to the LMU ToF resource, and also adjoining properties".</p> <p>Indicator 4.4.2: "Transportation and stacking of logs are designed to have minimum adverse environmental impacts".</p> <p>Indicator 4.4.3: "ToFM demonstrates usage of harvest residue in a manner having no negative environmental impact".</p> <p>Criterion 6.2: "Operations and practices in the LMU are to avoid soil degradation and maintenance of water quality".</p> <p>Indicator 6.2.1: "Techniques such as deep soil tillage and use of unsuitable machinery which may lead to soil erosion and run-off into water courses should be avoided".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires use of species that are suitable to soil and natural conditions (3.1), requires minimisation of damages to environment (4.4); soil and water resources (6.2).</p> |
| 8.2.5 The standard requires that the indiscriminate disposal of waste on forest land shall be strictly avoided. Non-organic waste and litter shall be collected, stored in designated areas and removed in an environmentally-responsible manner. The spillage of oil or fuel during forest management operations shall be prevented. Emergency procedures for the minimisation of risk of environmental harm arising from the accidental spillage shall be in place. | YES | <p>NCCF-STD-ToF</p> <p>Criterion 3.5: "Disposable of waste and Minimisation of Risk of Environmental Harm".</p> <p>Indicator 3.5.1: "indiscriminate disposal of waste on ToF land shall be strictly avoided".</p> <p>Indicator 3.5.2 "Non-organic waste and litter shall be collected, stored in designated areas and removed in an environmentally responsible manner".</p> <p>Indicator 3.5.3: "The spillage of oil or fuel during management operations shall be prevented. Emergency procedures for the minimisation of risk of environmental harm arising from the accidental spillage shall be in place".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for disposal of waste, spillage of oil or fuel and minimisation of risk of environmental harm (3.5).</p> |
| 8.2.6 The standard requires that integrated pest management, appropriate silviculture alternatives and other biological measures | YES | <p>NCCF-STD-ToF</p> <p>Indicator 3.1.1: "Measures are taken to make use of natural mechanisms as applicable viz regeneration,</p> |

| | | |
|--|-----|---|
| shall be preferred to minimise the use of pesticides. | | <p>biological control of weeds and diseases, to maintain and enhance the health and vitality of ToF resource".</p> <p>Criterion 3.3: "The use of pesticides and herbicide is minimised, and WHO Guidelines and Stockholm Convention on Persistent Organic Pollutants are followed".</p> <p>Indicator 3.3.6: "Integrated Pest Management (IPM) practices are encouraged".</p> <p>Indicator 6.4.2: "The use of biological control agents shall always comply with recognized standards and protocols along with precautionary approach".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for minimisation of the pesticide's usage (3.3), requires an integrated pest management (3.3.6), usage of natural mechanisms (3.1.1) and regulates use of biological control agents (6.4.2).</p> |
| 8.2.7 The standard requires that any use of pesticides is documented. | YES | <p>NCCF-STD-ToF</p> <p>Criterion 3.3: "The use of pesticides and herbicide is minimised, and WHO Guidelines and Stockholm Convention on Persistent Organic Pollutants are followed".</p> <p>Indicator 3.3.5: Records are maintained for using hazardous substance and materials along with information on usage and disposal of containers.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for records on the pesticide's usage (3.3.5).</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. | YES | <p>NCCF-STD-ToF</p> <p>Criterion 3.3: "The use of pesticides and herbicide is minimised, and WHO Guidelines and Stockholm Convention on Persistent Organic Pollutants are followed".</p> <p>Indicator 3.3.1: "Use of WHO Type 1A and 1B pesticides is prohibited".</p> <p>Indicator 3.3.2: "Use of pesticides and herbicides restricted or banned by the government at the national/state/local level is prohibited".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes prohibition of the use of pesticides of WHO 1A and 1B class with an exemption clause (3.3.1).</p> |
| <p>8.2.9 The standard requires that pesticides, such as chlorinated hydrocarbons whose derivatives remain biologically active and accumulate in the food chain beyond their intended use, and any pesticides banned by international agreement, shall be prohibited.</p> <p>Note: "Pesticides banned by international agreements" are defined in the Stockholm</p> | YES | <p>NCCF-STD-ToF</p> <p>Criterion 3.3: "The use of pesticides and herbicide is minimised, and WHO Guidelines and Stockholm Convention on Persistent Organic Pollutants are followed".</p> <p>Indicator 3.3.1: "Use of WHO Type 1A and 1B pesticides is prohibited".</p> |

| | | |
|--|-----|---|
| Convention on Persistent Organic Pollutants. | | <p>Indicator 3.3.2: "Use of pesticides and herbicides restricted or banned by the government at the national/state/local level is prohibited".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard prohibits the use of chlorinated hydrocarbons, pesticides banned by Stockholm agreement (3.3) and other substances banned by national legislation (3.3.2).</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. | YES | <p>NCCF-STD-ToF</p> <p>Criterion 3.3: "The use of pesticides and herbicide is minimised, and WHO Guidelines and Stockholm Convention on Persistent Organic Pollutants are followed".</p> <p>Indicator 3.3.4 "Manufacturer's instructions are followed during application of pesticides and herbicides with proper equipment and training".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard requires that the use of pesticides shall follow manufacturer's instructions with proper equipment and training (3.3.4).</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. | YES | <p>NCCF-STD-ToF</p> <p>Criterion 3.4: "Where fertilizers are used, ToFM ensures adoption of SOPs developed at national/regional level".</p> <p>Indicator 3.4.1: "Soil testing and site-specific nutrient management practices including rotational cropping is encouraged".</p> <p>Indicator 3.4.2: "The use of chemical fertilizers is minimized and organic and bio-fertilisers are preferred to enhance soil fertility".</p> <p>Indicator 3.4.3: "Fertilizer wherever applied, should follow the SOPs as prescribed by national or regional agricultural extensions services, including GAP and national environmental protection legislation, if any".</p> <p>Indicator 3.4.4: "The frequency and type of fertilizer used are documented as far as possible".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires controlled use of fertilisers (3.4). It does not prohibit the use of fertilisers (even for soil nutrient management) but requires soil testing and site-specific nutrient management (3.4.1), minimisation of fertilisers and preference to organic and bio-fertilisers (3.4.2), SOP for the fertilisers use (3.4.3) and records keeping (3.4.4). Taking into account that the ToF is a part of the agroforestry practices, the approach is suitable and satisfies the objective of the PEFC requirement.</p> |
| 8.3 Criterion 3: Maintenance and encouragement of productive functions of forests (wood and non-wood) | | |
| 8.3.1 The standard requires that the capability of the TOF to provide wood | YES | NCCF-STD-ToF |

| | |
|--|--|
| <p>products, non-wood forest products and/or services from trees on a sustainable basis shall be maintained.</p> | <p>Criterion 4.1: "ToFM aims to maintain the productivity of the LMU to provide a range of goods and services specified in the management objective on a sustainable basis".</p> <p>Indicator 4.1.1: "The focus of ToFM should be on production of agricultural crops, wood and non-wood products in agroforestry whereas in case of UTF, emphasis is given on aesthetics, recreation, shade, pollution control and other environmental services".</p> <p>Indicator 4.1.2: "Best management practices incorporate traditional knowledge to ensure sustainability of goods and services".</p> <p>Indicator 4.1.3: "ToFM undertakes periodic review of its operations to ensure sustainability of goods and services from the LMU and relevant information are maintained".</p> <p>Indicator 4.1.4: "ToFM shall also consider sustainable use of non-wood products, where ToFM covers commercial use of non-wood forest products at a level which can have an impact on their long-term sustainability.</p> <p>Note: Under the scope of this standard, only tree-based products e.g. standing tree and harvested logs can be sold with certified claim. Certification of Non-wood products shall be considered separately under Non-wood Forest resource certification standard".</p> <p>Criterion 4.3: "Harvesting operations for tree resources in the LMU to be monitored as per provisions of Management Plan".</p> <p>Indicator 4.3.1: "ToFM undertakes a periodic survey and inventory of available tree resources in the LMU to estimate the growing stock/standing volume".</p> <p>Indicator 4.3.2: "ToFM documents the information of periodic survey, inventory and harvest".</p> <p>Indicator 4.3.3: "ToFM determines the total quantum of wood that can be harvested from the LMU as per provisions of the Management Plan. ToFM shall define the Annual harvest under the sustainable harvest limits based on suitable parameters as justification and shall have documented information as evidence.".</p> <p>Indicator 4.3.4: "The quantity and quality of the ToF resources and the capacity of the ToF 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 ToF resources".</p> <p>Indicator 4.3.5: "Harvesting levels of wood products shall not exceed a rate that can be sustained in the long term, and optimum use shall be made of the harvested products".</p> <p>Criterion 4.4: "ToFM ensures that the tending, harvesting and transport operations cause no or minimal adverse impact on environment and property of others".</p> <p>Indicator 4.4.1: "ToFM ensures that tending and harvesting operations minimize wastage and damage to the LMU ToF resource, and also adjoining properties".</p> <p>Compliance: Conformity</p> |
|--|--|

| | | |
|---|-----|--|
| | | Justification: The Standard includes requirements to maintain production capability of ToF (4.1, 4.3, 4.4). |
| 8.3.2 The standard requires that sound economic performance shall be pursued, taking into account possibilities for new markets and economic activities in connection with all relevant goods and services of forests. | YES | NCCF-STD-ToF <p>Criterion 4.2: "ToFM aims to achieve sound economic performance, considering available market information and possible new economic activities in connection with all relevant goods and services from the LMU".</p> <p>Indicator 4.2.1: "ToFM strives to establish economic benefits from diversified activities including agriculture, wood, recreational and other goods and services".</p> <p>Indicator 4.2.2: "ToFM should endeavour to use market information mechanism such as e-NAM (National Agriculture Marketing) for marketing their produce at fair, reasonable and profitable price".</p> <p>Indicator 4.2.3: "ToFM endeavour to explore alternative markets for its produce and new markets for underutilized goods and services".</p> <p>Indicator 4.2.4 (Not applicable to NBA): "ToFM should explore opportunities to get benefit under schemes such as CDM, REDD+ and other existing and emerging Carbon markets".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for sound economic performance (4.2), diversification of production (4.2.1), usage of market studies (4.2.2.), exploration of new markets (4.2.3) and opportunities of programs such as CDM, REDD+ and other "Carbon markets" (4.2.4).</p> |
| 8.3.3 The standard requires that management, harvesting and regeneration operations shall be carried out at a time, and in a way, that does not reduce the productive capacity of the site, for example by avoiding damage to soil and retained stands and trees. | YES | NCCF-STD-ToF <p>Criterion 4.4: "ToFM ensures that the tending, harvesting and transport operations cause no or minimal adverse impact on environment and property of others".</p> <p>Indicator 4.4.1: "ToFM ensures that tending and harvesting operations minimize wastage and damage to the LMU ToF resource, and also adjoining properties".</p> <p>Indicator 4.4.2: "Transportation and stacking of logs are designed to have minimum adverse environmental impacts".</p> <p>Indicator 4.4.3: "ToFM demonstrates usage of harvest residue in a manner having no negative environmental impact".</p> <p>Criterion 6.2: "Operations and practices in the LMU are to avoid soil degradation and maintenance of water quality".</p> <p>Indicator 6.2.1: "Techniques such as deep soil tillage and use of unsuitable machinery which may lead to soil erosion and run-off into water courses should be avoided".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements that operation shall not reduce the productive capacity (4.4, 4.4.1) and shall</p> |

| | | |
|--|-----|---|
| | | not damage soil (6.2.1), water (6.2.1) and remaining vegetation (4.4.1, 4.4.2, 4.4.3). |
| 8.3.4 The standard requires that harvesting levels of both wood and non-wood forest products shall not exceed a rate that can be sustained in the long term, and optimum use shall be made of the harvested products. | YES | <p>NCCF-STD-ToF</p> <p>Indicator 4.3.1: "ToFM undertakes a periodic survey and inventory of available tree resources in the LMU to estimate the growing stock/standing volume".</p> <p>Indicator 4.3.2: "ToFM documents the information of periodic survey, inventory and harvest".</p> <p>Indicator 4.3.3: "ToFM determines the total quantum of wood that can be harvested from the LMU as per provisions of the Management Plan. ToFM shall define the Annual harvest under the sustainable harvest limits based on suitable parameters as justification and shall have documented information as evidence.".</p> <p>Indicator 4.3.4: "The quantity and quality of the ToF resources and the capacity of the ToF 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 ToF resources".</p> <p>Indicator 4.3.5: "Harvesting levels of wood products shall not exceed a rate that can be sustained in the long term, and optimum use shall be made of the harvested products".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires a long-term sustainability of wood and non-wood products harvesting that shall not exceed a rate that can be sustained at the long term (4.3).</p> |
| 8.3.5 The standard requires that adequate infrastructure such as roads, skid tracks or bridges shall be planned, established and maintained to ensure efficient delivery of goods and services while minimising negative impacts on the environment. | YES | <p>NCCF-STD-ToF</p> <p>Indicator 6.2.3: "Construction of roads, bridges, drainage facilities and other infrastructure and its maintenance is carried out in a manner that minimizes soil exposure, avoids run-off into water courses and also minimise the negative impacts on environment, 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> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for building infrastructure and its maintenance with minimisation of impacts on the soil and water and environment (6.2.3).</p> |
| 8.4 Criterion 4: Maintenance, conservation and appropriate enhancement of biological diversity in forest ecosystems | | |
| 8.4.1 The standard requires that management planning shall aim to maintain, conserve or enhance biodiversity | YES | <p>NCCF-STD-ToF</p> <p>Indicator 3.1.3: "The rehabilitation of degraded lands is encouraged through measures such as plantations, soil and water conservation, control of grazing, appropriate</p> |

| | |
|--|--|
| <p>on landscape, ecosystem, species and genetic levels.</p> <p>When the requirement is not achievable within individual, TOF-extensive areas, it can be considered at landscape level or through group certification.</p> | <p>agri-silvicultural practices. Tree planting activities shall promote and contribute to the improvement and restoration of ecological connectivity”.</p> <p>Indicator 3.1.6: “Measures shall be included in management planning to maintain, conserve or enhance biodiversity at landscape, ecosystem, species and genetic levels”.</p> <p>Indicator 3.2.2: “Native species that are well-adapted or suitable to site conditions shall be preferred. Only those introduced species, provenances or varieties shall be used whose impacts on the ecosystem and on the genetic integrity of native species and local provenances have been scientifically evaluated, and if negative impacts can be avoided or minimised”.</p> <p>Indicator 6.1.1 “Sites of historical, cultural and spiritual importance (like monuments, sacred groves, places of worship) and ecological importance (like protected, rare or sensitive ecosystems including riparian habitats and wetlands) are identified. In addition, areas that fulfil specific and recognised protective functions for society shall be mapped, and management plans and operations shall ensure the maintenance or enhancement of these functions.”.</p> <p>Indicator 6.1.2: “Measures are taken to protect the sites identified in 6.1.1 and species found therein. Sites are conserved and not negatively affected by various operations”.</p> <p>Indicator 6.1.3: “Rare, threatened and endangered plant and animal species shall be conserved. In addition, plant species with historical, cultural and spiritual significance shall also be conserved”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes general requirement for maintenance of biodiversity by improving ecological connectivity (3.1.3), maintenance and enhancement of biodiversity at the species, ecosystem, landscape and genetic level (3.1.6); protection of sites of ecological importance (6.1.1 and 6.1.2) and protection of rare, endangered and threatened species (6.1.3).</p> <p>The Standard also allow the requirements to be satisfied at the group level.</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> | <p>NCCF-STD-ToF</p> <p>Indicator 3.1.6: “Measures shall be included in management planning to maintain, conserve or enhance biodiversity at landscape, ecosystem, species and genetic levels”.</p> <p>Criterion 6.1: “Sites with recognised historical, cultural, spiritual and ecological significance are protected and conserved”.</p> <p>Indicator 6.1.1: “Sites of historical, cultural and spiritual importance (like monuments, sacred groves, places of worship) and ecological importance (like protected, rare or sensitive ecosystems including riparian habitats and wetlands) are identified. In addition, areas that fulfil specific and recognised protective functions for society shall be mapped, and management plans and operations</p> |

| | | |
|---|-----|--|
| | | <p>shall ensure the maintenance or enhancement of these functions".</p> <p>Indicator 6.1.2: "Measures are taken to protect the sites identified in 6.1.1 and species found therein. Sites are conserved and not negatively affected by various operations".</p> <p>Indicator 6.1.3: "Rare, threatened and endangered plant and animal species shall be conserved. In addition, plant species as well as those with historical, cultural and spiritual significance shall also be conserved".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes a general requirement for identification and protection of "sites with ecological importance" that includes protected, rare or sensitive ecosystems including riparian habitats and wetlands (6.1.1), requires protection of rare, threatened and endangered species and improvement of biodiversity at the genetic level (3.1.6).</p> |
| <p>8.4.3 The standard requires that protected, threatened and endangered plant and animal species shall not be exploited for commercial purposes. Where necessary, measures shall be taken for their protection and, where relevant, to increase their population.</p> <p>Note: The requirement does not preclude trade according to CITES requirements.</p> | YES | <p>NCCF-STD-ToF</p> <p>Indicator 6.1.3: "Rare, threatened and endangered plant and animal species shall be conserved. In addition, plant species as well as those with historical, cultural and spiritual significance shall also be conserved".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires protection of rare, endangered and threatened plant and animal species (6.1.3). This in principle avoids utilisation of those species for commercial purposes.</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> | YES | <p>NCCF-STD-ToF</p> <p>Criterion 3.1: "Measures are taken to maintain or improve the health and vitality of the LMU resource".</p> <p>Indicator 3.1.4: "Successful regeneration shall be ensured through natural regeneration or planting that is adequate to ensure the quantity and quality of the ToF resources".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires successful regeneration by natural regeneration or planting.</p> |
| <p>8.4.5 The standard requires that for reforestation and afforestation origins of native species that are well-adapted to site conditions shall be preferred. Only those introduced species, provenances or varieties shall be used whose impacts on the ecosystem and on the genetic integrity of native species and local provenances have been scientifically evaluated, and if negative impacts can be avoided or minimised.</p> | YES | <p>NCCF-STD-ToF</p> <p>Criterion 3.2: "In agroforests, apart from economic and environmental consideration, tree species suitable to the site are planted.</p> <p>In UTF, additional focus is on the recreational, amenity, aesthetic and pollution-control role of trees".</p> <p>Indicator 3.2.1: "In agroforests tree species planted are suitable to site conditions including edaphic conditions, water conservation, and the adjoining crops, as far as possible".</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>Indicator 3.2.2: "Native species that are well-adapted or suitable to site conditions shall be preferred. Only those introduced species, provenances or varieties shall be used whose impacts on the ecosystem and on the genetic integrity of native species and local provenances have been scientifically evaluated, and if negative impacts can be avoided or minimised".</p> <p>Indicator 3.2.3: "The invasive and disease carrying/prone tree species, harmful to the agricultural crop shall not be selected".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires to use species suitable to site conditions, including edaphic conditions, water conservation, and the adjoining crops (3.2.1), native and well adapted species (3.2.2), and prohibits use of invasive and disease carrying tree species (3.2.3).</p> <p>The standard also requires usage of only those introduced species whose impact on the ecosystem has been evaluated (3.2.2).</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> | YES | <p>NCCF-STD-ToF</p> <p>Indicator 3.1.3: "The rehabilitation of degraded lands is encouraged through measures such as plantations, soil and water conservation, control of grazing and fire, appropriate agri-silvicultural practices. Tree planting activities shall promote and contribute to the improvement and restoration of ecological connectivity".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes a requirement for improvement of ecological connectivity by planting (3.1.3).</p> |
| <p>8.4.7 The standard requires that genetically-modified trees shall not be used.</p> <p>Note: The restriction on the usage of genetically-modified trees has been adopted by the PEFC General Assembly based on the Precautionary Principle. Until enough scientific data on genetically modified trees indicates that impacts on human and animal health and the environment are equivalent to, or more positive than, those presented by trees genetically improved by traditional methods, no genetically-modified trees will be used.</p> | YES | <p>NCCF-STD-ToF</p> <p>Criterion 6.4: "Use of Genetically Modified Plant species is prohibited in the LMU.</p> <p><i>Note: Presently this restriction has been adopted based on the Precautionary Principle since there is insufficient scientific data on genetically modified trees /plants and their impacts on human, animal health and environment are equivalent to, or more positive than, those presented by trees genetically improved by traditional methods, no genetically-modified trees will be used".</i></p> <p>Indicator 6.4.1: "The use (commercial use as well as for research purposes) of genetically modified organisms/plants within the LMU shall not be permitted under any circumstances".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires prohibition of the GMO material (6.4.1).</p> |
| <p>8.4.8 The standard requires that a diversity of both horizontal and vertical structures</p> | YES | <p>NCCF-STD-ToF</p> |

| | | |
|---|-----|---|
| and the diversity of species such as mixed stands shall be promoted, where appropriate. The practices shall also aim to maintain or restore landscape diversity. | | <p>Indicator 3.1.6: "Measures shall be included in management planning to maintain, conserve or enhance biodiversity at landscape, ecosystem, species and genetic levels".</p> <p>Indicator 3.2.1: "In agroforests tree species planted are suitable to site conditions including edaphic conditions, water conservation, and the adjoining crops, as far as possible".</p> <p>Indicator 3.2.2: "Native species that are well-adapted or suitable to site conditions shall be preferred."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires diversity at the species, ecosystem and landscape level (3.1.6) and requires usage site suitable species and well adapted species that ensures diversity of species and structures (3.2.1, 3.2.2).</p> |
| 8.4.9 The standard requires that traditional management practices that create valuable ecosystems on appropriate sites shall be supported, where appropriate. | YES | <p>NCCF-STD-ToF</p> <p>Indicator 4.1.2: "Best management practices incorporate traditional knowledge to ensure sustainability of goods and services".</p> <p>Indicator 6.1.4): "Management systems, including traditional systems, that support conservation of the above identified, are followed".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for usage of traditional knowledge (4.1.2) and support of traditional management systems (6.1.4).</p> |
| 8.4.10 The standard requires that tending and harvesting operations shall be conducted in a way that does not cause lasting damage to ecosystems. Wherever possible, practical measures shall be taken to maintain or improve biological diversity. | YES | <p>NCCF-STD-ToF</p> <p>Indicator 3.1.6: "Measures shall be included in management planning to maintain, conserve or enhance biodiversity at landscape, ecosystem, species and genetic levels.".</p> <p>Indicator 3.5.3: "Based on the monitoring results, measures are taken to restore/maintain/improve the ToF resources".</p> <p>Criterion 4.4: "ToFM ensures that the tending, harvesting and transport operations cause no or minimal adverse impact on environment and property of others".</p> <p>Indicator 4.4.1: "ToFM ensures that tending and harvesting operations minimize wastage and damage to the LMU ToF resource, and also adjoining properties".</p> <p>Indicator 4.4.2: "Transportation and stacking of logs are designed to have minimum adverse environmental impacts".</p> <p>Indicator 4.4.3: "ToFM demonstrates usage of harvest residue in a manner having no negative environmental impact".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for minimisation of and avoidance of damage by tending, harvesting and</p> |

| | | |
|--|-----|--|
| | | transportation to ecosystems (4.4) and requires activity improving biodiversity (3.1.6). |
| 8.4.11 The standard requires that infrastructure shall be planned and constructed in a way that minimizes damage to ecosystems, especially to rare, sensitive or representative ecosystems and genetic reserves, and that takes threatened or other key species – in particular their migration patterns – into consideration. | YES | <p>NCCF-STD-ToF</p> <p>Indicator 6.2.3: “Construction of roads, bridges, drainage facilities and other infrastructure and its maintenance is carried out in a manner that minimizes soil exposure, avoids run-off into water courses and also minimise the negative impacts on environment, 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> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for building infrastructure and its maintenance with minimisation of impacts on the soil and water and environment (6.2.3).</p> |
| 8.4.12 The standard requires that, with due regard to management objectives, measures shall be taken to balance the effect of domesticated and wild animals on the regeneration and growth of trees, as well as on biodiversity and the control of fire. | YES | <p>NCCF-STD-ToF</p> <p>Indicator 5.1.1: “Establishment of mixture of tree species, agricultural crops and animals that are beneficial to local people is encouraged”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires mixture (balance) of trees, agriculture crops and animals (8.4.12). The requirement does not distinguish between domestic and wild animals and as such the requirement is expected to apply to both types of animals.</p> |
| 8.4.13 The standard requires that standing and fallen dead wood, hollow trees, old groves and rare tree species shall be left in quantities and distribution necessary to safeguard biological diversity, taking into account the potential effect on the health and stability of forests and on surrounding ecosystems. | YES | <p>NCCF-STD-ToF</p> <p>Indicator 3.1.6: “Measures shall be included in management planning to maintain, conserve or enhance biodiversity at landscape, ecosystem, species and genetic levels.”.</p> <p>Indicator 5.1.1 (not applicable to NBA): “Establishment of mixture of tree species, agricultural crops and animals that are beneficial to local people is encouraged”.</p> <p>Indicator 5.1.2 (not applicable to NBA): “In UTF mixture of tree species providing multiple environmental and social benefits is encouraged”.</p> <p>Indicator 6.1.3: Rare, threatened and endangered plant and animal species shall be conserved. In addition, plant species with historical, cultural and spiritual significance shall also be conserved.</p> <p>Indicator 6.1.6: “Few 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”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> |

| | | |
|---|-----|--|
| | | <p>The Standard requires leaving fallen dead wood, hollow tress, old growths and rare tree species (6.1.5).</p> <p>The Standard requires protection of rare species (2.1.2 and 6.1.3) and requires activities promoting biological diversity (3.16).</p> |
| 8.5 Criterion 5: Maintenance or appropriate enhancement of protective functions in forest management (notably soil and water) | | |
| 8.5.1 The standard requires that protective functions of trees within the agriculture and settlement landscape shall be maintained and enhanced. | YES | <p>NCCF-STD-ToF</p> <p>Indicator 3.1.1: "Measures are taken to make use of natural mechanisms as applicable viz regeneration, biological control of weeds and diseases, to maintain and enhance the health and vitality of ToF resource".</p> <p>Indicator 3.1.2: "Measures are adopted to avoid or minimise the risk of degradation of land".</p> <p>Indicator 3.1.3 "The rehabilitation of degraded lands is encouraged through measures such as plantations, soil and water conservation, control of grazing and fire, appropriate agri-silvicultural practices. Tree planting activities shall promote and contribute to the improvement and restoration of ecological connectivity."</p> <p>Criterion 6.2: "Operations and practices in the LMU are to avoid soil degradation and maintenance of water quality".</p> <p>Indicator 6.2.1: "Techniques such as deep soil tillage and use of unsuitable machinery which may lead to soil erosion and run-off into water courses should be avoided".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard ensures protective functions of ToF through maintaining health and vitality of TOF resources (3.1.1, 3.1.2) and through protection of soil and water resources from negative impacts of ToF management (6.2).</p> |
| 8.5.2 The standard requires that areas that fulfil specific and recognised protective functions for society shall be mapped, and forest management plans and operations shall ensure the maintenance or enhancement of these functions. | YES | <p>NCCF-STD-ToF</p> <p>Criterion 6.1: "Sites with recognised historical, cultural, spiritual and ecological significance are protected and conserved".</p> <p>Indicator 6.1.1: "Sites of historical, cultural and spiritual importance (like monuments, sacred groves, places of worship) and ecological importance (like protected, rare or sensitive ecosystems including riparian habitats and wetlands) are identified. In addition, areas that fulfil specific and recognised protective functions for society shall be mapped, and management plans and operations shall ensure the maintenance or enhancement of these functions."</p> <p>Indicator 6.1.2: "Measures are taken to protect the sites identified in 6.1.1 and species found therein. Sites are conserved and not negatively affected by various operations".</p> <p>Criterion 6.2: "Operations and practices in the LMU are to avoid soil degradation and maintenance of water quality".</p> <p>Indicator 6.2.1: "Techniques such as deep soil tillage and use of unsuitable machinery which may lead to soil erosion and run-off into water courses should be avoided".</p> |

| | | |
|---|-----|---|
| | | Compliance: Conformity Justification: The Standard requires identification (6.1.1) and protection of sites of ecological importance (like protected, rare or sensitive ecosystems including riparian habitats and wetlands) and sites that fulfil protective functions. |
| 8.5.3 The standard requires that special care shall be given to forestry operations on sensitive soils and erosion-prone areas as well as in areas where operations might lead to excessive erosion of soil into watercourses. Techniques applied and the machinery used shall be suitable for such areas. Special measures shall be taken to minimise the pressure of animal populations on these areas. | YES | NCCF-STD-ToF Indicator 6.1.2: "Measures are taken to protect the sites identified in 6.1.1 and species found therein. Sites are conserved and not negatively affected by various operations". Criterion 6.2: "Operations and practices in the LMU are to avoid soil degradation and maintenance of water quality". Indicator 6.2.1: "Techniques such as deep soil tillage and use of unsuitable machinery which may lead to soil erosion and run-off into water courses should be avoided". Compliance: Conformity Justification: The Standard includes requirements to avoid soil degradation, soil erosion and negative impacts on water resources (6.1.1, 6.1.2, 6.2). |
| 8.5.4 The standard requires that special care shall be given to forestry operations in forest areas with water protection functions to avoid adverse effects on the quality and quantity of water resources. Inappropriate use of chemicals or other harmful substances or inappropriate silvicultural practices influencing water quality in a harmful way shall be avoided. Downstream water balance and water quality shall not be significantly affected by the operations. | YES | NCCF-STD-ToF Criterion 6.1: "Sites with recognised historical, cultural, spiritual and ecological significance are protected and conserved". Indicator 6.1.1 (Not applicable to NBA): "Sites of historical, cultural and spiritual importance (like monuments, sacred groves, places of worship) and ecological importance (like protected, rare or sensitive ecosystems including riparian habitats and wetlands) are identified. In addition, areas that fulfil specific and recognised protective functions for society shall be mapped, and management plans and operations shall ensure the maintenance or enhancement of these functions." Indicator 6.1.2: "Measures are taken to protect the sites identified in 6.1.1 and species found therein. Sites are conserved and not negatively affected by various operations". Criterion 6.2: "Operations and practices in the LMU are to avoid soil degradation and maintenance of water quality". Indicator 6.2.1: "Techniques such as deep soil tillage and use of unsuitable machinery which may lead to soil erosion and run-off into water courses should be avoided". Indicator 6.2.4: "special care shall be given to management operations in areas with water protection functions to avoid adverse effects on the quality and quantity of water resources. Inappropriate use of chemicals or other harmful substances or inappropriate silvicultural practices influencing water quality in a harmful way shall be avoided. Downstream water balance and water quality shall not be significantly affected by the operations". |

| | | |
|---|-----|--|
| | | Compliance: Conformity Justification: The Standard includes requirements for identification of sensitive ecosystems, that also include riparian areas and wetlands (6.1.1, 6.1.2). The Standard also includes general requirement protection water resources from soil erosion (6.2.1), prohibits to use harmful chemicals around water sources and practices with negative impacts on water quality and quantity (6.2.4). |
| 8.5.5 The standard requires that construction of roads, bridges and other infrastructure shall be carried out in a manner that minimises bare soil exposure, avoids the introduction of soil into watercourses and preserves the natural level and function of water courses and river beds. Proper road drainage facilities shall be installed and maintained. | YES | NCCF-STD-ToF Indicator 6.2.3: "Construction of roads, bridges, drainage facilities and other infrastructure and its maintenance is carried out in a manner that minimizes soil exposure, avoids run-off into water courses and also minimise the negative impacts on environment, 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". Compliance: Conformity Justification: The Standard includes requirements for building infrastructure and its maintenance with minimisation of impacts on the soil and water and environment (6.2.3). |
| 8.6 Criterion 6: Maintenance or appropriate enhancement of socio-economic functions and conditions | | |
| 8.6.1 The standard requires that forest management planning shall aim to respect all socio-economic functions of forests. | YES | NCCF-STD-ToF Indicator 2.2.3: "The management plan includes measures to ensure that overall economic viability, social and environmental well-being is not negatively affected". Indicator 3.2.4: "In UTF, tree species selection is based on the recreational, amenity, aesthetic and pollution control role and values of trees". Criterion 5.1: "Agroforestry focuses on multiple functions of trees, agricultural crops and animal mixtures useful to society, whereas UTF focuses on recreation, aesthetic and amenity and pollution control roles. Both should consider opportunities for employment, wherever possible". Criterion 6.1: "Sites with recognised historical, cultural, spiritual and ecological significance are protected and conserved". Compliance: Conformity Justification: The Standard requires that social well-being is not negatively affected (2.2.3), includes requirements for socio-economic functions (5.1, recreation, aesthetic, pollution control, opportunities for employment); and identification and protection of sites with historical, cultural and spiritual significance (6.1.1, 6.1.2). |
| 8.6.2 The standard requires that adequate public access to forests for the purpose of | YES | NCCF-STD-ToF |

| | | |
|--|-----|---|
| recreation shall be provided, taking into account respect for ownership rights, safety and the rights of others, the effects on forest resources and ecosystems, as well as compatibility with other functions of the forest. | | <p>Indicator 5.1.3: Public access to UTF is provided, subject to ownership and use rights and ecological sensitivity of the LMU".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The public access is only required for UTF (5.1.3) that is usually owned by communities. No public access is guaranteed for BA and NBA that is publicly owned, usually as small-scale ownership. The public (communities) land, both ToF as well as forests provides sufficient opportunities for public recreation.</p> |
| 8.6.3 The standard requires that sites with recognised specific historical, cultural or spiritual significance and areas fundamental to meeting the needs of indigenous peoples and local communities (e.g. health, subsistence) shall be protected or managed in a way that takes due regard of the significance of the site. | YES | <p>NCCF-STD-ToF</p> <p>Criterion 6.1: "Sites with recognised historical, cultural, spiritual and ecological significance are protected and conserved".</p> <p>Indicator 6.1.1: "Sites of historical, cultural and spiritual importance (like monuments, sacred groves, places of worship) and ecological importance (like protected, rare or sensitive ecosystems including riparian habitats and wetlands) are identified".</p> <p>Indicator 6.1.2: "Measures are taken to protect the sites identified in 6.1.1 and species found therein. Sites are conserved and not negatively affected by various operations".</p> <p>Indicator 6.1.5: "Sites with recognised specific historical, cultural or spiritual significance and areas fundamental to meeting the needs of local communities (e.g. health, subsistence) shall be protected or managed in a way that takes due regard of the significance of the site".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires protection of sites with historical, spiritual and cultural significance and sites fundamental meeting the needs of local communities (6.1.5). The indigenous people (respectively scheduled tribes) are considered as a part of local communities.</p> |
| 8.6.4 The standard requires that management shall promote the long-term health and well-being of communities within or adjacent to the forest management area, where appropriate supported by engagement with local communities and indigenous peoples. | YES | <p>Indicator 5.1.4: "Preference should be given to local people in employment in various operations such as management, planting, harvesting, processing, maintenance, value addition and protection".</p> <p>Indicator 5.1.5: "Management shall promote the long-term health and well-being of communities within or adjacent to the area, where appropriate it shall be supported by engagement with local communities".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes a requirement encouraging local employment (5.1.4) and promoting health and well-being of local communities (5.1.5). The indigenous people (respectively scheduled tribes) are considered as a part of local communities.</p> |
| 8.6.5 The standard requires that traditional knowledge and recognised best practice for agroforestry & TOF management be | YES | NCCF-STD-ToF |

| | | |
|---|-----|--|
| utilized. Equitable sharing of the benefits arising from the utilizations of such knowledge, innovations and practices shall be encouraged. | | <p>Indicator 4.1.2: "Best management practices incorporate traditional knowledge to ensure sustainability of goods and services".</p> <p>Indicator 6.1.4: "Management systems, including traditional systems, that support conservation of the above identified, are followed.</p> <p>Note: Equitable sharing of the benefits arising from the utilization of such traditional knowledge shall be encouraged".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for usage of traditional knowledge (4.1.2) and support of traditional management systems, including equitable sharing of benefits of such knowledge (6.1.4).</p> |
| 8.6.6 The standard requires that management shall give due regard to the role of forestry in local economies. Special consideration shall be given to new opportunities for training and employment of local people, including indigenous peoples. | YES | <p>NCCF-STD-ToF</p> <p>Criterion 5.1: "Agroforestry focuses on multiple functions of trees, agricultural crops and animal mixtures useful to society, whereas UTF focuses on recreation, aesthetic and amenity and pollution control roles. Both should consider opportunities for employment, wherever possible".</p> <p>Indicator 5.1.4: "Preference should be given to local people in employment in various operations such as management, planting, harvesting, processing, maintenance, value addition and protection".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard includes a requirement for important of ToF management in local economy and local employment (5.1).</p> |
| 8.6.7 The standard requires that forest management shall contribute to research activities and data collection needed for sustainable forest management or support relevant research activities carried out by other organisations, as appropriate. | YES | <p>NCCF-STD-ToF</p> <p>Indicator 2.1.3: "Management plan shall take into account the results of scientific research, especially regarding Intensive ToF management (Block plantations and Urban forests) and wherever applicable at group level. Management shall also contribute to research activities and data collection needed for sustainable management or support relevant research activities carried out by other organizations, as appropriate".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires contribution to research (2.1.3).</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 | YES | <p>NCCF-STD-ToF</p> <p>Criterion 2.7: "Management plan contains procedures to monitor and assess the status of ToF resource and its periodicity, yield prediction, tracking and tracing system,</p> |

| | | |
|--|------------|---|
| <p>performed, and results fed back into the planning process.</p> | | <p>PEFC certified claim & logo usage of the wood from LMU and management activities and their social and environmental impacts. Monitoring is conducted according to the provisions in the management plan".</p> <p>Indicator 2.7.1: "Monitoring covers the following parameters:</p> <ul style="list-style-type: none"> a. Yield of all wood coming from ToF resource b. Growth rates, regeneration and health of the ToF resource c. Cost and productivity of the ToF resource management d. Environmental and social impacts of the management operations e. Structural/Composition changes in the flora and fauna, if any" <p><u>Note:</u> Indicator 2.7.1 (e) is applicable only on UTF</p> <p>Indicator 2.7.2: "Written procedures for tracking and tracing of the certified wood include the following:</p> <ul style="list-style-type: none"> a. measures to control and track data on volume of wood and its origin b. accounting of certified products before and after the harvesting and description on sale invoices c. measures to ensure segregation of certified wood from non-certified wood through marking, labelling, separate storage and documents used for sale, including invoice, sale-purchase documents". <p>Indicator 2.7.4: "Monitoring takes place as per the provisions in the management plan".</p> <p>Indicator 2.7.5: "Measures are taken to prevent and/or mitigate negative impacts on environment and social values based on monitoring".</p> <p>Criterion 2.8: "Monitoring results are analysed and the findings are incorporated into the implementation and revision of management plan".</p> <p>Indicator 2.8.1: "The management plan is revised and updated periodically".</p> <p>Indicator 2.8.2: "Monitoring results are analysed, and measures taken in <i>Indicator 2.7.4</i> are documented for future reference".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirement for monitoring of forest resources, including all elements of the management plan (2.7). Results of the monitoring are analysed and considered in management planning (2.8).</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</p> | <p>YES</p> | <p>NCCF-STD-ToF</p> <p>Criterion 2.7: "Management plan contains procedures to monitor and assess the status of ToF resource and its periodicity, yield prediction, tracking and tracing system, PEFC certified claim & logo usage of the wood from LMU and management activities and their social and</p> |

| | | |
|--|-----|---|
| factors, air pollutants or by forest management operations. | | <p>environmental impacts. Monitoring is conducted according to the provisions in the management plan”.</p> <p>Indicator 2.7.1: “Monitoring covers the following parameters:</p> <ul style="list-style-type: none"> a. Yield of all wood coming from ToF resource b. Growth rates, regeneration and health of the ToF resource c. Cost and productivity of the ToF resource management d. Environmental and social impacts of the management operations e. Structural/Composition changes in the flora and fauna, if any”. <p>Criterion 3.6: “Health of ToF resource in LMU should be monitored”.</p> <p>Indicator 3.6.1: “The parameters to monitor and maintain health of ToF resource are identified based on the local conditions, including pests, diseases, land degradation, overgrazing, overstocking, risks of fire”.</p> <p>Indicator 3.6.2: “Parameters identified in indicator 3.5.1 are monitored periodically, and related documents are maintained”.</p> <p>Indicator 3.6.3: “Based on the monitoring results, measures are taken to restore/maintain/improve the ToF resources”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirement for monitoring of ToF resources that also covers their health (2.7). Specific requirements for periodic health monitoring cover pests, diseases, land degradation, overgrazing, overstocking, risks of fire health (3.6).</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. | YES | <p>NCCF-STD-ToF</p> <p>Criterion 2.7 (not applicable to NBA): “Management plan contains procedures to monitor and assess the status of ToF resource and its periodicity, yield prediction, tracking and tracing system, PEFC certified claim & logo usage of the wood from LMU and management activities and their social and environmental impacts. Monitoring is conducted according to the provisions in the management plan”.</p> <p>Indicator 2.7.1: “Monitoring covers the following parameters:</p> <ul style="list-style-type: none"> a. Yield of all wood coming from ToF resource b. Growth rates, regeneration and health of the ToF resource c. Cost and productivity of the ToF resource management d. Environmental and social impacts of the management operations e. Structural/Composition changes in the flora and fauna, if any”. |

| | | |
|---|-----|--|
| | | <p>Indicator 4.1.1: The focus of ToFM should be on production of agricultural crops, wood and non-wood products in agroforestry whereas in case of UTF, emphasis is given on aesthetics, recreation, shade, pollution control and other environmental services.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard regulates production of agriculture crops, wood and non-wood products and other services of the ToF resources (4.1.1). Their monitoring is a part of monitoring of the whole ToF resource (2.7) and their health (3.6)</p> |
| 9.1.4 The standard requires that working conditions shall be regularly monitored and adapted as necessary. | YES | <p>NCCF-STD-ToF</p> <p>Indicator 5.3.5: Working conditions shall be regularly monitored and adapted as necessary.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes a requirement for monitoring of work conditions (5.3.5).</p> |
| 9.2 Internal audit | | |
| 9.2.1 Objectives | | |
| The standard requires that an internal audit programme at planned intervals shall provide information on whether the management system | | |
| <p>a) conforms to</p> <ul style="list-style-type: none"> • the organisation's requirements for its management system; • the requirements of the national sustainable forest management standard | YES | <p>NCCF-STD-ToF</p> <p>Indicator 2.11.1: "An internal audit programme at planned intervals shall provide information on whether the management system conforms to the organization's requirements for its management system; the requirements of the national sustainable forest management standard is effectively implemented and maintained".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires an internal audit of the management system and compliance with the ToF standard, and their effective implementation (2.11).</p> |
| b) is effectively implemented and maintained. | YES | <p>NCCF-STD-ToF</p> <p>Indicator 2.11.1: "An internal audit programme at planned intervals shall provide information on whether the management system conforms to the organization's requirements for its management system; the requirements of the national sustainable forest management standard is effectively implemented and maintained".</p> <p>Compliance: Conformity</p> |

| | | |
|---|-----|---|
| | | Justification: The Standard requires an internal audit of the management system and compliance with the ToF standard, and their effective implementation. |
| 9.2.2 Organisation The standard requires that the organisation shall: | | |
| a) plan, establish, implement and maintain an audit programme(s) including the frequency, methods, responsibilities, planning requirements and reporting, which shall take into consideration the importance of the processes concerned and the results of previous audits; | YES | NCCF-STD-ToF The organization shall: a) plan, establish, implement and maintain an audit programme(s) including the frequency, methods, responsibilities, planning requirements and reporting, which shall take into consideration the importance of the processes concerned and the results of previous audits. b) define the audit criteria and scope for each audit. c) select the auditors and conduct audits to ensure objectivity and the impartiality of the audit process. d) ensure that the results of the audits are reported to relevant management. e) retain documented information as evidence of the implementation of the audit programme and the audit results. Compliance: Conformity Justification: The Standard includes requirements for organization of internal audits (2.11) that are identical with the PEFC requirements. |
| b) define the audit criteria and scope for each audit; | YES | NCCF-STD-ToF The organization shall: a) plan, establish, implement and maintain an audit programme(s) including the frequency, methods, responsibilities, planning requirements and reporting, which shall take into consideration the importance of the processes concerned and the results of previous audits. b) define the audit criteria and scope for each audit. c) select the auditors and conduct audits to ensure objectivity and the impartiality of the audit process. d) ensure that the results of the audits are reported to relevant management. e) retain documented information as evidence of the implementation of the audit programme and the audit results. Compliance: Conformity Justification: The Standard includes requirements for organization of internal audits (2.11) that are identical with the PEFC requirements. |

| | | |
|--|-----|--|
| c) select the auditors and conduct audits to ensure objectivity and the impartiality of the audit process; | YES | <p>NCCF-STD-ToF</p> <p>The organization shall:</p> <p>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.</p> <p>b) define the audit criteria and scope for each audit.</p> <p>c) select the auditors and conduct audits to ensure objectivity and the impartiality of the audit process.</p> <p>d) ensure that the results of the audits are reported to relevant management.</p> <p>e) retain documented information as evidence of the implementation of the audit programme and the audit results.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for organization of internal audits (2.11) that are identical with the PEFC requirements.</p> |
| d) ensure that the results of the audits are reported to relevant management; | YES | <p>NCCF-STD-ToF</p> <p>The organization shall:</p> <p>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.</p> <p>b) define the audit criteria and scope for each audit.</p> <p>c) select the auditors and conduct audits to ensure objectivity and the impartiality of the audit process.</p> <p>d) ensure that the results of the audits are reported to relevant management.</p> <p>e) retain documented information as evidence of the implementation of the audit programme and the audit results.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for organization of internal audits (2.11) that are identical with the PEFC requirements.</p> |
| e) retain documented information as evidence of the implementation of the audit programme and the audit results. | YES | <p>NCCF-STD-ToF</p> <p>The organization shall:</p> <p>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.</p> <p>b) define the audit criteria and scope for each audit.</p> |

| | | |
|--|-----|--|
| | | <p>c) select the auditors and conduct audits to ensure objectivity and the impartiality of the audit process.</p> <p>d) ensure that the results of the audits are reported to relevant management.</p> <p>e) retain documented information as evidence of the implementation of the audit programme and the audit results.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for organization of internal audits (2.11) that are identical with the PEFC requirements.</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; | YES | <p>NCCF-STD-ToF</p> <p>The organization shall:</p> <p>2.12.1: "An annual management review shall at least include</p> <p>a) the status of actions from previous management reviews.</p> <p>b) changes in external and internal issues that are relevant to the management system.</p> <p>c) information on the organization's performance, including trends in: • nonconformities and corrective actions; • monitoring and measurement results; • audit results.</p> <p>d) opportunities for continual improvement".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for management review (2.12) that are identical with the PEFC requirements.</p> |
| b) changes in external and internal issues that are relevant to the management system; | YES | <p>NCCF-STD-ToF</p> <p>The organization shall:</p> <p>2.12.1: "An annual management review shall at least include</p> <p>a) the status of actions from previous management reviews.</p> <p>b) changes in external and internal issues that are relevant to the management system.</p> <p>c) information on the organization's performance, including trends in: • nonconformities and corrective actions; • monitoring and measurement results; • audit results.</p> <p>d) opportunities for continual improvement".</p> <p>Compliance: Conformity</p> |

| | | |
|---|-----|---|
| | | Justification: The Standard includes requirements for management review (2.12) that are identical with the PEFC requirements. |
| c) information on the organisation's performance, including trends in: <ul style="list-style-type: none"> • nonconformities and corrective actions; • monitoring and measurement results; • audit results; | YES | NCCF-STD-ToF The organization shall: 2.12.1: "An annual management review shall at least include a) the status of actions from previous management reviews. b) changes in external and internal issues that are relevant to the management system. c) information on the organization's performance, including trends in: • nonconformities and corrective actions; • monitoring and measurement results; • audit results. d) opportunities for continual improvement". Compliance: Conformity Justification: The Standard includes requirements for management review (2.12) that are identical with the PEFC requirements. |
| d) opportunities for continual improvement | YES | NCCF-STD-ToF The organization shall: 2.12.1: "An annual management review shall at least include a) the status of actions from previous management reviews. b) changes in external and internal issues that are relevant to the management system. c) information on the organization's performance, including trends in: • nonconformities and corrective actions; • monitoring and measurement results; • audit results. d) opportunities for continual improvement". Compliance: Conformity Justification: The Standard includes requirements for management review that are identical with the PEFC requirements. |
| 9.3.2 The standard requires that the outputs of the management review shall include decisions related to continual improvement opportunities and any need for changes to the management system. | YES | NCCF-STD-ToF 2.12.2: "The outputs of the management review shall include decisions related to continual improvement opportunities and any need for changes to the management system". Compliance: Conformity Justification: |

| | | |
|---|-----|--|
| | | The Standard includes requirements for management review (2.12) that are identical with the PEFC requirements. |
| 9.3.3 The standard requires that documented information as evidence of the results of management reviews shall be retained. | YES | <p>NCCF-STD-ToF</p> <p>2.12.3: "The documented information as evidence of the results of management reviews shall be retained".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for management review (2.12) that are identical with the PEFC requirements.</p> |
| 10. Improvement | | |
| 10.1 Nonconformity and corrective action | | |
| 10.1.1 The standard requires that when a nonconformity occurs, the organisation shall: | | |
| <p>a) react to the nonconformity and, as applicable:</p> <p>i. take action to control and correct it;</p> <p>ii. deal with the consequences;</p> | YES | <p>NCCF-STD-ToF</p> <p>2.13.1: "When a nonconformity occurs, the organization shall:</p> <p>a) react to the nonconformity and, as applicable take action to control and correct it & deal with the consequences.</p> <p>b) evaluate the need for action to eliminate the causes of the nonconformity, in order that it does not recur or occur elsewhere, by reviewing the nonconformity; determining the causes of the nonconformity; & determining if similar nonconformities exist, or could potentially occur.</p> <p>c) implement any action needed.</p> <p>d) review the effectiveness of any corrective action taken.</p> <p>e) make changes to the management system, if necessary".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for management of non-conformities (2.13) that are satisfying the PEFC requirements.</p> |
| <p>b) evaluate the need for action to eliminate the causes of the nonconformity, in order that it does not recur or occur elsewhere, by:</p> <p>i. reviewing the nonconformity;</p> <p>ii. determining the causes of the nonconformity;</p> <p>iii. determining if similar nonconformities exist, or could potentially occur;</p> | YES | <p>NCCF-STD-ToF</p> <p>2.13.1: "When a nonconformity occurs, the organization shall:</p> <p>a) react to the nonconformity and, as applicable take action to control and correct it & deal with the consequences.</p> <p>b) evaluate the need for action to eliminate the causes of the nonconformity, in order that it does not recur or occur elsewhere, by reviewing the nonconformity; determining the causes of the nonconformity; & determining if similar nonconformities exist, or could potentially occur.</p> <p>c) implement any action needed.</p> |

| | | |
|---|-----|--|
| | | <p>d) review the effectiveness of any corrective action taken.</p> <p>e) make changes to the management system, if necessary”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for management of non-conformities that are satisfying the PEFC requirements.</p> |
| c) implement any action needed; | YES | <p>NCCF-STD-ToF</p> <p>2.13.1: “When a nonconformity occurs, the organization shall:</p> <p>a) react to the nonconformity and, as applicable take action to control and correct it & deal with the consequences.</p> <p>b) evaluate the need for action to eliminate the causes of the nonconformity, in order that it does not recur or occur elsewhere, by reviewing the nonconformity; determining the causes of the nonconformity; & determining if similar nonconformities exist, or could potentially occur.</p> <p>c) implement any action needed.</p> <p>d) review the effectiveness of any corrective action taken.</p> <p>e) make changes to the management system, if necessary”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for management of non-conformities (2.13) that are satisfying the PEFC requirements.</p> |
| d) review the effectiveness of any corrective action taken; | YES | <p>NCCF-STD-ToF</p> <p>2.13.1: “When a nonconformity occurs, the organization shall:</p> <p>a) react to the nonconformity and, as applicable take action to control and correct it & deal with the consequences.</p> <p>b) evaluate the need for action to eliminate the causes of the nonconformity, in order that it does not recur or occur elsewhere, by reviewing the nonconformity; determining the causes of the nonconformity; & determining if similar nonconformities exist, or could potentially occur.</p> <p>c) implement any action needed.</p> <p>d) review the effectiveness of any corrective action taken.</p> <p>e) make changes to the management system, if necessary”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> |

| | | |
|--|-----|--|
| | | The Standard includes requirements for management of non-conformities (2.13) that are satisfying the PEFC requirements. |
| e) make changes to the management system, if necessary. | YES | <p>NCCF-STD-ToF</p> <p>2.13.1: "When a nonconformity occurs, the organization shall:</p> <p>a) react to the nonconformity and, as applicable take action to control and correct it & deal with the consequences.</p> <p>b) evaluate the need for action to eliminate the causes of the nonconformity, in order that it does not recur or occur elsewhere, by reviewing the nonconformity; determining the causes of the nonconformity; & determining if similar nonconformities exist, or could potentially occur.</p> <p>c) implement any action needed.</p> <p>d) review the effectiveness of any corrective action taken.</p> <p>e) make changes to the management system, if necessary".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for management of non-conformities (2.13) that are satisfying the PEFC requirements.</p> |
| 10.1.2 The standard requires that corrective actions shall be appropriate to the effects of the nonconformities encountered. | YES | <p>NCCF-STD-ToF</p> <p>2.13.2: "Corrective actions shall be appropriate to the effects of the nonconformities encountered".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for management of non-conformities (2.13) that are satisfying the PEFC requirements.</p> |
| 10.1.3 The standard requires that the organisation shall retain documented information as evidence of: | | |
| a) the nature of the nonconformities and any subsequent actions taken; | YES | <p>NCCF-STD-ToF</p> <p>2.13.3: "The organization shall retain documented information as evidence of:</p> <p>a) the nature of the nonconformities and any subsequent actions taken.</p> <p>b) the results of any corrective action".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for management of non-conformities that are satisfying the PEFC requirements (2.13).</p> |
| b) the results of any corrective action. | YES | NCCF-STD-ToF |

| | | |
|--|-----|--|
| | | <p>2.13.3: "The organization shall retain documented information as evidence of:</p> <p>a) the nature of the nonconformities and any subsequent actions taken.</p> <p>b) the results of any corrective action".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for management of non-conformities that are satisfying the PEFC requirements (2.13).</p> |
| <p>10.2 Continual improvement</p> <p>The standard requires that the suitability, adequacy and effectiveness of the sustainable forest management system and the sustainable management of the forest shall be continuously improved.</p> | YES | <p>NCCF-STD-ToF</p> <p>Indicator 2.14.1: The suitability, adequacy and effectiveness of the sustainable ToF management system and the sustainable management of the ToF shall be continuously improved.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes a requirement for continuous improvement (2.14.1).</p> |

| PEFC benchmark requirement | YES / NO | Reference to system documentation (including quotation of relevant text) |
|--|----------|--|
| PEFC ST 1003: Appendix 2/C | | |
| <p>A2/C</p> <p>The standard requires that management of the agricultural components within a TOF system shall follow good agricultural practice.</p> | YES | <p>NCCF-STD-ToF</p> <p>Indicator 2.1.1: There is a written management plan for the LMU, with management objectives, Good Agricultural Practises (GAP) and Standard Operating Procedures (SOPs), actions and measures".</p> <p>Indicator 3.4.3: Fertilizer wherever applied, should follow the SOPs as prescribed by national or regional agricultural extensions services, including GAP and national environmental protection legislation, if any.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires the management plan to follow Good Agriculture Practices – GAP (2.1.1). Specific reference to the GAP is also made for usage of fertilizers (3.4.3).</p> |

| PEFC benchmark requirement | YES / NO | Reference to system documentation (including quotation of relevant text) |
|-----------------------------------|----------|--|
| PEFC ST 1003: Appendix 2/D | | |
| Appendix 2, D | YES | Compliance: |

| PEFC benchmark requirement | YES / NO | Reference to system documentation (including quotation of relevant text) |
|----------------------------|----------|---|
| Exempted requirements | | <p>Justification:</p> <p>The Standard defines three types of ToF:</p> <ul style="list-style-type: none"> - Block agroforest (BA); - Non-block agroforest (NBA); and - Urban tree formation (UTF). <p>The chapter Scope defines criteria for extensive and intensive ToF.</p> <p>The Standard does not apply exemptions allowed by PEFC ST 1003:2018. Instead, it allows the requirements to be applied at the group level in case of group certification.</p> |

| PEFC benchmark requirement | YES / NO | Reference to system documentation (including quotation of relevant text) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|------------------------|---|--------|-----------|-----------|----------------------------|--|--|---|-------|--|--|--|--|---|--------|---|---|------------------------|--|---|------|---|-----------------------------------|--|--|---|-------------|---|--|--|-----------|---|---------------|---|
| PEFC ST 1003: Appendix 2/D | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>Appendix 2, E</p> <p>If the national standard-setting process agrees to develop specific requirements and/or standard(s) for TOF, all PEFC ST 1003:2018 requirements are applicable with the potential exception of some requirements in the case of TOF-agriculture extensive and/or TOF-settlement extensive system. In this case, the standard-setting process must build agreement around the appropriate threshold between "intensive" or "extensive" TOF systems, based on clear rationale. The eligibility of a particular TOF system must be clearly communicated within standard(s).</p> <p>When establishing the threshold between the intensive and extensive categorisation of TOF systems, the national standard-setting process should consider at least:</p> <ul style="list-style-type: none"> a) size of management unit b) tree cover/hectare c) economic value of production d) intensity of management e) scale of cultural, ecological and conservation value | YES | <p>NCCF-STD-ToF</p> <table border="1"> <thead> <tr> <th>S. No.</th><th>Formation</th><th>Threshold</th></tr> </thead> <tbody> <tr> <td colspan="3">A. Block Agroforest</td></tr> <tr> <td>1</td><td>Block</td><td> <p>Area (min) = 0.1 ha *one edge longer than 10 m; (limiting factor is area)</p> <p>Area (max) = 25 ha (single block, individual ownership, as per Land Ceiling Act)</p> <p>After a single block is >25 ha area, NCCF-STD-FM-01/2017 shall be applicable</p> <p>Intensive ToF</p> </td></tr> <tr> <td colspan="3">B. Non-Block Agroforest (Extensive ToF)</td></tr> <tr> <td>2</td><td>Linear</td><td>Single/Multiple row; Maximum width = 10 m (limiting factor is edge length)</td></tr> <tr> <td>3</td><td>Isolated and scattered</td><td>Singletree in farms, bunds, rural homesteads etc</td></tr> <tr> <td>4</td><td>Bund</td><td>Trees around a farm boundary, tank bund, etc.</td></tr> <tr> <td colspan="3">C. Urban Trees and Forests</td></tr> <tr> <td>5</td><td>Urban trees</td><td>Single/Multiple row; Maximum width = 10 m (limiting factor is edge length)</td></tr> <tr> <td></td><td></td><td>Extensive</td></tr> <tr> <td>6</td><td>Urban Forests</td><td> <p>Area (min) = 0.1 ha *one edge longer than 10 m; (limiting factor is area)</p> </td></tr> </tbody> </table> | S. No. | Formation | Threshold | A. Block Agroforest | | | 1 | Block | <p>Area (min) = 0.1 ha *one edge longer than 10 m; (limiting factor is area)</p> <p>Area (max) = 25 ha (single block, individual ownership, as per Land Ceiling Act)</p> <p>After a single block is >25 ha area, NCCF-STD-FM-01/2017 shall be applicable</p> <p>Intensive ToF</p> | B. Non-Block Agroforest (Extensive ToF) | | | 2 | Linear | Single/Multiple row; Maximum width = 10 m (limiting factor is edge length) | 3 | Isolated and scattered | Singletree in farms, bunds, rural homesteads etc | 4 | Bund | Trees around a farm boundary, tank bund, etc. | C. Urban Trees and Forests | | | 5 | Urban trees | Single/Multiple row; Maximum width = 10 m (limiting factor is edge length) | | | Extensive | 6 | Urban Forests | <p>Area (min) = 0.1 ha *one edge longer than 10 m; (limiting factor is area)</p> |
| S. No. | Formation | Threshold | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| A. Block Agroforest | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | Block | <p>Area (min) = 0.1 ha *one edge longer than 10 m; (limiting factor is area)</p> <p>Area (max) = 25 ha (single block, individual ownership, as per Land Ceiling Act)</p> <p>After a single block is >25 ha area, NCCF-STD-FM-01/2017 shall be applicable</p> <p>Intensive ToF</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| B. Non-Block Agroforest (Extensive ToF) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | Linear | Single/Multiple row; Maximum width = 10 m (limiting factor is edge length) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | Isolated and scattered | Singletree in farms, bunds, rural homesteads etc | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4 | Bund | Trees around a farm boundary, tank bund, etc. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| C. Urban Trees and Forests | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5 | Urban trees | Single/Multiple row; Maximum width = 10 m (limiting factor is edge length) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Extensive | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 6 | Urban Forests | <p>Area (min) = 0.1 ha *one edge longer than 10 m; (limiting factor is area)</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| PEFC benchmark requirement | YES / NO | Reference to system documentation (including quotation of relevant text) | | |
|----------------------------|----------|---|---|--|
| | | | | Area (max) = 25 ha (single block, individual ownership, as per Land Ceiling Act) Intensive |
| | | The classification of ToF categories into extensive and intensive system has been done based on following threshold limits. | | |
| | | Categories of classification | Extensive ToF | Intensive ToF |
| | | a) Size of management unit | Thresholds are defined in above table | Thresholds are defined in above table |
| | | b) Tree cover/ha | Less than 10% cover/ha | More than 10% cover/ha |
| | | c) Economic value of production | Annual cut: up to 10% of Standing Trees* | Annual cut: up to 20% of Standing trees |
| | | d) Intensity of management | Low Intensity silvicultural and management operations | High Intensity silvicultural and management operations |
| | | e) Scale of cultural, ecological and conservation value | Low degree of relevance at Individual level** | Higher degree of relevance |
| | | Compliance: Conformity | | |
| | | Justification: The Standard defines three principal categories of ToF (BA, NBA and UTF) while BA are considered as intensive, NBA as extensive considered as “extensive”. For UTF, the Standard distinguishes urban trees as extensive while urban forests as extensive. The following criteria are used to distinguish between the categories and their extensive/intensive nature: a) Size of a management unit (or block); b) Tree cover per hectare c) Economic value of production, d) Intensity of management, e) Scale of social or environmental importance, f) Structure of ToF (block, linear, individual/scattered, bund); g) Presence in an urban area. | | |

Annex D: Stakeholder's representation in the SDG and TWG

| Name | Organisation | Stakeholder Category | |
|---------------------------------------|--|--------------------------|-------------|
| Dr Devendra Pandey | Independent Consultant and TOF Expert | Trees Outside Forest | Chairperson |
| Suneel Pandey | V.P ITC PSPD | Industry | SDG & TWG |
| Ms Taruna GICIA | India Pvt Ltd | Industry | SDG & TWG |
| Ms Deepali Rautela | NCCF | NGO Member | SDG & TWG |
| Mr Varun Grover | NCCF | NGO Member | SDG & TWG |
| As nominated by the Ministry | Joint Secretary, Ministry of Agriculture | Government Authority | SDG |
| Mr Ajoy Bhattacharya | NHAI-NGHM | Government Authority | SDG |
| Mr Bhowmik H Shanghvi | Hindustan Pencils Pvt. Ltd | Industry | SDG |
| Mr M.P. Mishra | Star Paper | Industry | SDG |
| Dr CN Pandey | Century Ply | Industry | SDG |
| Rahul Vohra CL | Gupta Exports Limited | Industry | SDG |
| Shyam Srivastava | International Paper APPM | Industry | SDG |
| Mr Vivek Saxena | Haryana Forest Development Corporation | State forest departement | SDG |
| DFO Yamunanagar | Haryana Forest Development Corporation | State forest departement | SDG |
| Mr Saurabh Gupta | Punjab State Forest Department | State forest departement | SDG |
| Mr Nischal Gautam | Sikkim Forest Department | State forest departement | SDG |
| Mr HV Girish | Uttar Pradesh Forest Department | State forest departement | SDG |
| As nominated by the Forest Department | Andaman & Nicobar Forest Department Member | State forest departement | SDG |
| Dr Ajay Kumar | CSE | NGO | SDG |
| Mr R. D Tiwari | Utthan Trust | NGO | SDG |
| Ms Satabdi Mohapatra | Development Alternatives | NGO | SDG |

| | | | |
|-------------------------|--|----------------------------|-----|
| Mr Rajeev Baruah | Better Cotton Initiative | NGO | SDG |
| Mr Manish Chandi | Andaman Nicobar Environmental Team | NGO | SDG |
| Ms K Rathna | Centre for Indian Bamboo Resource and Technology (CIBART) | Research & Scientific | SDG |
| Dr JV Sharma | The Energy and Resources Institute (TERI) | Research & Scientific | SDG |
| Dr A. Arunachalam | ICAR-Central Agroforestry Research Institute | Research & Scientific | SDG |
| Dr AK Handa | ICAR | Research & Scientific | SDG |
| Mr Akhilesh Singh | IORA Ecological Solutions | Research & Scientific | SDG |
| Mr Srikanth K Panigrahi | Institute of Sustainable Development | Research & Scientific | SDG |
| Mr A.K. Bansal | Independent Consultant | Independent Experts | SDG |
| Dr A.K. Singh | | Independent Experts | SDG |
| Mr AK Varma | Independent Consultant | Independent Experts | SDG |
| Mr A.K. Srivastava | | Independent Experts | SDG |
| Mr R B Sinha | | Independent Experts | SDG |
| Dr Amar Prasad | Power Trading Corporation | Independent Experts | SDG |
| Mr Aatish Khan | Xynteo | Independent Experts | SDG |
| Mr Vivek Vyas | Independent Consultant | Independent Experts | SDG |
| Shergill Hunter | Shergill Farms | Farmers | SDG |
| Pankaj Tandon | Shergill Farms | Farmers | SDG |
| Valerie Hara | Hara Farms | Farmers | SDG |
| Dr VP Singh | International Center for Tropical Agriculture (CIAT) | International Stakeholders | SDG |
| Dr SK Dhyani | South Asia Regional Program, World Agroforestry Centre (ICRAF) | International Stakeholders | SDG |
| Mr Aditya Petwal | International Union for Conservation of Nature (IUCN) | International Stakeholders | SDG |
| Mr Kundan Burnwal | GIZ India | International Stakeholders | SDG |

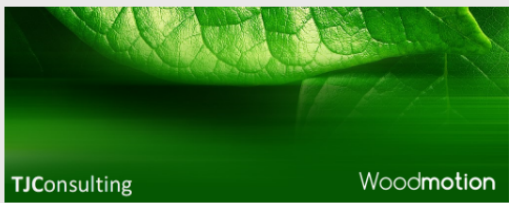
| | | | |
|----------------------|----------------------------|----------------------------|-----|
| Ms Ana Alicia García | Accreditation Body, Mexico | International Stakeholders | SDG |
| Mr Antonio Brunori | PEFC, Italy | International Stakeholders | SDG |
| Mr Matthew Reddy | WBCSD | International Stakeholders | SDG |

Annex E: Comments from the PEFC Council's international consultation

The PEFC Council has announced at its website an international consultation on the endorsement of the scheme.

The PEFC Council had received no contribution or comments from stakeholders.

Annex F: Stakeholder's survey (FORM used in the survey)



Stakeholders questionnaire - PEFC endorsement of the NCCF's Standard for Trees outside Forests (ToF, India)

TJConsulting is a part of the Woodmotion Sarl, Luxembourg based consulting company. TJConsulting has been selected by the PEFC Council (www.pefc.org) to conduct an assessment of the NCCF's (Network for Certification and Conservation of Forests, India) standard for Trees outside Forests (ToF) that will be used as basis for the PEFC endorsement of the ToF Standard.

A part of the ToF assessment is also evaluation of the standard setting process of the scheme. In order to objectively assess various stakeholders engagement, TJConsulting also runs a survey amongst the Indian stakeholders, their participation in and contribution to the process. That's why we need your opinion about the standard setting process of the ToF in India.

In addition to your opinion, we also collect some personal information about you such as your name and email address to be able to contact you for follow up if needed.

We securely store this data until the end of the PEFC endorsement process.

We respect your trust and protect your privacy, and therefore will never sell or share this data with any third parties.

By filling out this form you agree that we will process your data in line with our privacy policy.

If you have any questions or change your mind, contact Mr Jaro Tymrak via tymrak@tj-consult.com.

[Next](#)

Part I: General Information

Stakeholder name

Main Contact
First Name Last Name

E-mail
ex: myname@example.com
example@example.com

Stakeholder group

- ☐ Land owners / managers
- ☐ Forest / trees / agriculture related industry
- ☐ Environmental NGOs
- ☐ Other NGOs
- ☐ Scientific and technological communities
- ☐ Workers and trade unions
- ☐ Government, including local authorities

[Back](#) [Next](#)

Part II: Announcement of the ToF development process

Have you noticed announcement of start of the revision of the ToF Standard (2016) ☐ YES ☐ NO ☐ NOT SURE

Where did you notice the announcement?

- ☐ Direct mailing (letter/e-mail)
- ☐ At the NCCF's (www.nccf.in) website
- ☐ NCCF's Press Release
- ☐ NCCF's social media (facebook, twitter,...)
- ☐ Other

Did you have access to the standard setting procedures (rules for the revision of the NCCF's scheme) ☐ YES ☐ NO ☐ NOT SURE

Additional notes:
Type here...

[Back](#) [Next](#)

Part III: Standard Development Group / Technical Working Group

The NCCF's multi-stakeholder body that was responsible for development of the ToF

Have you been invited to nominate your representative to the SDG / TWG for the ToF development? ☐ YES ☐ NO ☐ NOT SURE

What was the form of the invitation?

- ☐ General invitation by NCCF's website, press release, etc
- ☐ Direct invitation by e-mail/letters
- ☐ Other

Have you made a nomination to the SDG / TWG? ☐ YES ☐ NO

Has your nomination been accepted/rejected? ☐ YES ☐ NO

Have you received justification of rejection of your nomination? ☐ YES ☐ NO ☐ NOT SURE

Additional notes:
Type here...

[Back](#) [Next](#)

Part IV: Public consultation

Have you noticed public consultation(s) on a draft ToF Standard?

☐ Yes
☐ No
☐ NOT SURE

Where have you noticed invitation to public consultation?

☐ Direct mailing (E-mail/letter)
☐ NCCF or related websites
☐ NCCF's press release
☐ Journals / magazines
☐ NCCF's social media (Facebook, Twitter)
☐ Other

Have you submitted comments

☐ YES
☐ NO
☐ NOT SURE

Have your comments been considered?

☐ YES
☐ NO
☐ NOT SURE

Have you received / or had access to feedback on consideration of your comments?

☐ YES
☐ NO
☐ NOT SURE

Additional notes:

Type here...

Back

Next

Part VI: Participation in the SDG / TWG

This section only applies to those stakeholders who participated in the PEFC Netherlands' Forum

Was the work of the SDG / TWG organised in transparent way?

☐ YES
☐ NO
☐ NOT SURE

Has the SDG reached consensus on the ToF standard?

☐ YES
☐ NO
☐ NOT SURE

Additional notes:

Type here...

Click to edit this text...

Back

Next

Part V: Complaints

Have you submitted to the NCCF any complaint relating to the revision process?

☐ YES
☐ NO
☐ NOT SURE

Has the complaint been considered and resolved by the NCCF?

☐ YES
☐ NO
☐ NOT SURE

Additional notes:

Type here...

Back

Next

Protection of personal data

Here at TJConsulting we take your privacy seriously, and will only use your personal information to conduct the objective and transparent assessment of the PEFC Certification Scheme Netherlands (PCSN). During the course of the assessment, we might contact you by the provided e-mail to clarify your submission or to obtain further detail.

We might be asked by the PEFC Council (www.pefc.org) to disclose respondents to this survey as a part of their quality assurance mechanism.

Do you consent to us passing on your details to the PEFC Council.

☐ YES
☐ NO

Submit

Back

Annex G: Report from in-country visit

As a part of the assessment, the assessor conducted during 19 – 22 April 2022 an in-country visit with the following main objectives:

Objective of the visit

The objective of the visit was:

- Gathering additional information on the standard setting process and verification of the information submitted as a part of the scheme application, mainly through interview of the applicant's office and relevant stakeholders' interview;
- Evaluation of organisational relationships and tasks of different bodies involved in the implementation of the scheme.
- Clarification of issues and non-conformities identified in the draft interim report.

Program and timetable of the online interview

| Date | 19.4.2022 | 20.4.2022 | 21.4.2022 | 22.4.2022 |
|-----------|--|-------------------|-----------------------|---|
| Day | Day one | Day two | Day three | Day four |
| Itinerary | Meeting with NCCF Stakeholders meetings | Field visit (TOF) | Stakeholders meetings | Stakeholders meeting closing meeting |

Stakeholders interviewed

Mr. Tymrak interviewed a number of stakeholders relevant to the development of the NVFCS scheme (see also chapter 8.2.4).

The following topics were discussed:

- a) Introduction of the interviewed stakeholder, its organization, interest in forestry and the process;
- b) Participation in the standard setting process;
- c) Main topics of the forest management / ToF standard relevant to the stakeholders.

| Name | Stakeholder Category | Organization |
|-------------------------|-----------------------------|---|
| Mr A.K. Srivastava | NCCF | NCCF |
| Dr. Devendra Pandey | Government, SDG Chairperson | NCCF |
| Mr Sachin Jain | NCCF Convener-Treasurer | NCCF |
| Dr Rajesh Rawat | Trade | EPCH, Export Council of handicrafts |
| Dr Vivek Saxena | Government | Forest Department, Haryana |
| Mr. A M Singh | ToF Expert, Government | Project Director TOFI |
| Mr Avani Varma | NCCF | Chairman NCCF |
| Mr. Bhowmik H Shanghvi | Industry, Trade | Hindustan Pencils Pvt. Ltd |
| Mr Srikanth K Panigrahi | Research & Scientific | Institute of Sustainable Development |
| Dr AK Handa | Research & Scientific | ICAR-Central Agroforestry Research Institute |
| Dr A. Arunachalam | Research & Scientific | ICAR-Central Agroforestry Research Institute |
| Mr. P K Garg | Industry, Trade | Senior General Manager, Star Paper Mills, |
| Mr. S P Mishra | Industry, Trade | Senior General Manager, Star Paper Mills, |
| Dr. J.V. Sharma | E-NGO | TERI (Environmental non-governmental organisation) |
| Mr Aditya Petwal | E-NGO | International Union for Conservation of Nature (IUCN) |
| Dr. C. N. Pandey | Industry, Trade | Century Ply |
| Mr. Abhijit Sharan | Conformity Assessment | GICIA India Pvt. Ltd. |
| Amil Jauhri | Conformity Assessment | Indian National Accreditation Body |

Annex H: Comments from PEFC Council's internal review of the report

| Chapter (Report) / PEFC requirement | PEFC Council comment | Assessor's response |
|-------------------------------------|---|---|
| 4 Recommendation | Clarify whether the outdates reference happens only with the CoC ST (PEFC ST 2002), or also with the CBs requirements for CoC ST (PEFC ST 2003). | <p>The table included a mistake and the non-conformity is linked to the wrong reference to PEFC ST 2003 instead of PEFC ST 2002. Now corrected. The scheme documentation is making the reference to PEFC ST 2002:2013 as “dated reference” and for that reason the assessment concluded the non-conformity.</p> <p>Concerning the reference to PEFC ST 2002, the referenced scheme documentation (Procedures for notification) is using “undated reference” and as such, following the ISO rules, it refers to the latest edition of the document.</p> <p>(See chapters 5.6, 8.5 and 8.6).</p> |
| 8.2.4 Stakeholders interviews | <p>These point below were highlighted by the interviewed stakeholder or these were the main driver topics to start developing the standard in the first place?</p> <p>Could you please add some further details on this?</p> | <p>Those were the topics highlighted by the interviewed stakeholders that were discussed or considered during the standard setting process.</p> <p>The text has been amended to obtain more detail.</p> |
| 8.1 Structure of the documentation | Could you please confirm that the documents marked with purple are applicable for the both SFM and ToF, thus these should be included in the complete SFM system documentation, which is published on the PEFC website? Or these are just prepared for the upcoming review and revision of the Indian SFM standard? | <p>NCCF STD SSP TOF refers in its scope to the development of NCCF standards and as such applies to the development of any NCCF standard (SFM or TOF). Also, the text of the document does neither explicitly reference SFM or TOF standard. As indicated in chapter 6, this document has been modified during the assessment process and formally approved by the NCCF on 20 May 2022.</p> <p>PEFC ST 2001:2020 is referenced for the usage of the PEFC Logo with no differentiation between the SFM, TOF or CoC certification.</p> <p>NCCF – STD – DRP – TOF: Dispute procedures. Document does not include any specific reference to SFM or TOF certification and as such applies to all certifications, respectively to all processes of the NCCF, including standard setting.</p> <p>The Observation raised in chapter 8.1 discusses the topic that using “TOF” in the document “identifier – code” is confusing.</p> |



|