



Assessment of the Portuguese PEFC Certification Scheme against the requirements of the PEFC Council

Final report, 3 May 2023



Woodmotion

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Abbreviations

BoD	Board of Directors
CB	Certification body
CFFP	The Portuguese Forestry Sector Council (Conselho da Fileira Florestal Portuguesa)
CoC	Chain of Custody
EA	European Cooperation for Accreditation
FMP	Forest management plan
FMU	Forest management level
IAF	International Accreditation Forum
ICNF	Instituto da Conservação da Natureza e das Florestas (operating as SSB)
IPAC	INSTITUTO PORTUGUÊS DE ACREDITAÇÃO (Portuguese national accreditation body)
IPQ	Portuguese Quality System, the Instituto Português da Qualidade (IPQ), operating as the National Standards Body
ISO	International Standardisation Organisation
NSB	National Standards Body (IPQ)
PEFC	Programme for the Endorsement of Forest Certification
SFM	Sustainable forest management
SSB	Sectorial Standards Body (ICNF)
ToF	Trees outside Forests

1 Background

PEFC Portugal (here-in-after “the applicant”) has submitted its forest certification scheme (here-in-after “the scheme”) (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 “PEFC Portuguese scheme” against the PEFC Council’s requirements, TJConsulting **recommends to the PEFC Council:**

- a) **to note a minor non-conformity** (No. 3-4) with the PEFC Council’s requirements relating to the standard-process without the need of any corrective action¹;
- b) **to request PEFC Portugal to resolve 12 non-conformities** with the PEFC Council requirements; for standard setting procedures (No. 1, 2), standard setting process (No. 5, 6), forest management / ToF standard / forest plantations (No. 7-12) and forest management / ToF certification bodies (13-14);
- c) **to note a specific nature of non-conformities 10 and 11** relating to ToF²;
- d) **to make decision on the scheme** to maintain the PEFC endorsement.

List of non-conformities		
1	Content of the “standard development / revision proposal” (PEFC ST 1001:2017, 6.1.1 a-d, 6.1.2)	Standard setting procedures
2	Availability of comments from public consultation (PEFC ST 1001:2017, 6.5.1g)	Standard setting procedures
3	Balanced representation of stakeholders, participation of key stakeholders (PEFC ST 1001:2017, 6.4.2a, 6.4.3)	Standard setting process
4	Public consultation – direct mailing, invitation of disadvantaged/key stakeholders (PEFC ST 1001:2017, 6.5.1b, c)	Standard setting process
5	Identification of the official language on the standard (PEFC ST 1001:2017, 7.2.2 c)	Standard setting process
6	Identification of the “Review date” on the standard (PEFC ST 1001:2017, 7.2.2 d)	Standard setting process
7	Application of the Standard to all operators in the defined forest area (PEFC ST 1003:2018, 4.1 c)	SFM / ToF / forest plantations standard
8	Forest conversion (PEFC ST 1003:2018, 8.1.4)	SFM / ToF / forest plantations standard
9	Conversion of ecologically important non-forest ecosystems (PEFC ST 1003:2018, 8.1.5)	ToF
10	Definition of the term “Ecologically important non-forest area” (Assessment and Endorsement of national Trees outside Forests standards - Approved by the PEFC Board on 8th March 2023)	ToF
11	Identification of the ToF certified area (Assessment and Endorsement of national Trees outside Forests standards - Approved by the PEFC Board on 8th March 2023)	ToF
12	Eligibility of plantations converted from ecologically important non-forest ecosystems for forest certification (PEFC ST 1003:2018/A1, 8.1.5)	Forest plantations
13	Transfer of information to PEFC Portugal (Annex 6, req. 11)	SFM certification bodies
14	Public availability of the certification report summary (Annex 6, req. 15)	SFM certification bodies

¹ TJConsulting does not recommend to resolve the minor non-conformities relating to the standard setting process (3, 4) as this would require the applicant to repeat a significant part of the standard setting process. However, the PEFC Council should ask PEFC Portugal to formally acknowledge the non-conformity and commit itself to implement appropriate actions during the next revision process.

² It should be noted that the minor non-conformities 10 and 11 relate to the PEFC requirements that were established by the PEFC Council Board of Directors on 8 March 2023 and that only came into force at the stage of preparing the final draft report, i.e. after the NP 4406 standard formal approval and after the commencement of the endorsement evaluation. They were neither known to PEFC Portugal at the stage of the standard development nor at the stage of submission of the application for the PEFC endorsement.

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 and revision process conducted by PEFC Portugal, (respectively by the IPQ / ICNF as the official standardisation bodies) is primarily governed by OR TC 145 (*Standard Setting Procedures of the Technical Committee 145*).

The scheme's standard setting procedures are logically structured and are a part of the IPQ general documentation on standardisation. They provide procedural basis for multi-stakeholder, open, transparent and consensus driven process. The procedures **comply with** PEFC ST 1001:2017, except two minor non-conformities:

- (1) **Procedures: Standard Proposal** (PEFC ST 1001:2017, 6.1.1 a-d, 6.1.2)
- (2) **Procedures: Availability of comments from public consultation** (PEFC ST 1001:2017, 6.5.1g)

Details about the assessment and the scheme compliance can be found in chapter 8.2.1 and Annex A of this report.

5.2 Standard setting process

The scope of this assessment is focused on the standard setting / revision activities carried out during the period between October 2019 (process announcement) and May 2022 (publication of the NP 4406 standard).

The NP 4406 standard has been developed as a part of the formal national Portuguese standardisation that is governed by the IPQ (the National Standardisation Body – NSB). The IPQ has recognised the ICNF as the Sectorial Standardisation Body (SSB) for forest management related topics and also recognised Technical Committee 145 operating under the ICNF.

Technical Committee 145 is a permanent committee that serves as a consensus building body for the NP 4406 standard but also other standards (e.g. an FSC forest management standard for Portugal).

The TC 145 consists of 73 voting members plus Chairman with balance amongst the defined categories. In addition, TC 145 also includes a large number on “non-voting members”, usually additional representatives of the voting member organisation:

- Industries and Trade (A), incl. forest owners - 25,
- Small and medium enterprises (A1) - 7,
- Public administration (B) - 13,
- Consumers (C) – 0 (one non-voting),
- Labor (D) - 0,

- Research centres and higher education institutions (E) - 9,
- Managing and Implementation of the standards (F) - 10,
- Non-governmental Organisations (G) - 3,
- Non-governmental Environmental Protection Organisations (G1) - 5.

Following the internal discussions within Technical Committee 145, a public consultation and a pilot testing, Technical Committee 145 reached consensus by unanimous voting. The standard was then formally approved by the IPQ, the Portuguese National Standardisation Body (NSB), and published at the IPQ website.

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

- (3) **Process: Balanced representation of stakeholders, Participation of key stakeholders** (PEFC ST 1001:2017, 6.4.2a, 6.4.3)
- (4) **Process: Public consultation – direct mailing, invitation of disadvantaged/key stakeholders** (PEFC ST 1001:2017, 6.5.1b, c)
- (5) **Process: Identification of the official language on the standard** (PEFC ST 1001:2017, 7.2.2 c)
- (6) **Process: Identification of the “Review date” on the standard** (PEFC ST 1001:2017, 7.2.2 d)

Details about the assessment and the scheme’s compliance can be found in chapters 8.2.2, 8.2.3 and Annex A of this report.

5.3 Group forest management / ToF certification

The scheme allows group certification as a certification model that is suitable to the small forest / ToF owners that is typical situation for the country. The requirements for group certification are defined in NP 4406, as an Annex B to the standard.

The NP 4406 standard follows the structure of ISO HLS (High Level Standard for management system) and PEFC ST 1002:2018 and **complies** with the PEFC requirements (PEFC ST 1002:2018).

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

5.4 Sustainable forest management standard

The requirements for the sustainable forest management are defined in NP 4406 standard (*Portuguese Standard for the Sustainable Forest Management Systems - Application of the pan-European criteria for sustainable forest management*).

The document is structured identically to the ISO High Level Standard structure for management systems and thus also consistent with the structure of PEFC ST 1003:2018.

The requirements of NP 4406 standard are largely identical with PEFC ST 1003:2018.

Concerning the specific performance-based requirements for sustainable forest management (chapter 8 Operation), the standard is based on six (6) criteria originating from the Pan European Operational Level Guidelines. For each of the criteria the standard defines specific requirements that are clear, auditable and unambiguous.

NP 4406 **complies** with the requirements of PEFC ST 1003:2018, except the following minor non-conformities:

- (7) **The Standard shall apply to all operators in the defined forest area** (PEFC ST 1003:2018, 4.1 c)
- (8) **Forest conversion** (PEFC ST 1003:2018, 8.1.4)(8)

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

5.5 Requirements for Trees outside Forests (ToF)

The requirements for the ToF are defined in NP4406 in the core part of the document that is common for both the SFM and ToF certification, with an Annex C that provides interpretations and modifications of specific requirements of the core part for the purposes of the ToF certification.

NP 4406 is using the same approach as applied by PEFC ST 1003:2018 that is based on the following principles:

- a) Requirements in NP4406, core part are also applicable to the TOF certification;
- b) Any modifications, alterations, interpretations or additional requirements are defined in Annex C to NP 4406.

NP 4406 **complies** with the requirements for ToF (PEFC ST 1003:2018, including Appendix 2), except the following minor non-conformities:

- (9) **Conversion of ecologically important non-forest ecosystems** (PEFC ST 1003:2018, 8.1.5)
- (10) **Definition of the term “Ecologically important non-forest area”** (Assessment and Endorsement of national Trees outside Forests standards - Approved by the PEFC Board on 8th March 2023)
- (11) **Identification of the ToF certified area** (Assessment and Endorsement of national Trees outside Forests standards - Approved by the PEFC Board on 8th March 2023)

It should be noted that the minor non-conformities 10 and 11 relate to the PEFC requirements that were established by the PEFC Council Board of Directors on 8 March 2023 and that only came into force at the stage of preparing the final draft report, i.e. after the NP 4406 standard formal approval and after the commencement of the endorsement evaluation. They were neither known to PEFC Portugal at the stage of the standard development nor at the stage of submission of the application for the PEFC endorsement.

When considering those minor non-conformities (10, 11) and making the PEFC endorsement decision, the PEFC Council should take into account those facts as well as the retrospective nature of these PEFC requirements.

In addition, the minor non-conformities identified for the sustainable forest management standard (No. 6-8, see chapter 5.4) also apply to the ToF.

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

5.6 Requirements for Forest Plantations

The NP 4406 standard is also applicable to “forest plantations” as “forest plantations” are covered by the term “forest”.

Where specific requirements or interpretations apply to “forest plantations”, it is included in the core part of the standard under a specific “Plantations Guidance”. This approach is compatible with PEFC ST 1003:2018. Instead of having the interpretation under a separate Annex (as in PEFC ST 1003:2018), the interpretation is directly placed under the specific requirement.

NP 4406 **complies** with the requirements for forest plantations (PEFC ST 1003:2018, including Appendix 2), except the following minor non-conformities:

(12) **Eligibility of plantations converted from ecologically important non-forest ecosystems for forest certification** (PEFC ST 1003:2018/A1, 8.1.5)

In addition, the minor non-conformities identified for the sustainable forest management standard (No. 6-8, see chapter 5.4) also apply to the forest plantations.

Details about the assessment and the scheme compliance can be found in chapter 8.6 and Annex E of this report.

5.6 Chain of custody requirements

The applicant has formally adopted the PEFC international standard for chain of custody (PEFC ST 2002:2020) by referencing the standard in PEFC PT 1001 and PEFC PT 1002; and as such **complies** with the PEFC requirements.

Details about the assessment and the scheme compliance can be found in chapter 8.7 of this report.

5.6 Requirements for chain of custody certification bodies

The applicant has indirectly adopted the PEFC International requirements for chain of custody certification bodies (PEFC ST 2003:2020) through mandatory references in PEFC PT 1001 and PEFC PT 1002, and as such **complies** with the PEFC requirements.

Details about the assessment and the scheme compliance can be found in chapter 8.8.1 of this report.

5.7 Requirements for forest management / ToF certification bodies

The requirements for certification bodies for forest management / ToF certification are described in PEFC PT 1002 and PEFC PT 1005. The PEFC PT 1005 document largely follows the structure of ISO/IEC 17021-1 and includes additional requirements, especially those for competencies of auditors and for certification process. The document requires the certification bodies to hold valid accreditation from an EA / IAF member and to conduct the forest management / ToF certification as accredited certification.

The scheme's requirements for certification bodies, their accreditation and notification **comply** with Annex 6 of the PEFC Technical Document, except the following minor non-conformities:

- (13) **Transfer of information to PEFC Portugal** (Annex 6, req. 11)
- (14) **Public availability of the certification report summary** (Annex 6, req. 15)

Details about the assessment and the scheme compliance can be found in chapter 8.8.2 and Annex F 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

Assessment and Endorsement of national Trees outside Forests standards (Approved by the PEFC Board on 8 March 2023)

Tender dossier Call for proposals for the assessment of the PEFC Portugal forest certification scheme against the PEFC Council requirements

The scheme's documentation

The assessment of the scheme was based on the following documentation provided by the PEFC Council on 1 July 2022 and additional information provided by the applicant during the assessment process.

Submitted scheme documentation

Scheme documentation

NP 4406:2022	<i>Portuguese Standard for the Sustainable Forest Management Systems - Application of the pan-European criteria for sustainable forest management</i>
PEFC PT 1001:2022	<i>Portuguese Forest Certification Scheme – Technical Reference (Amended 12-12-2022)</i>
PEFC PT 1002:2022	<i>General Criteria for Accreditation of Certification Bodies operating certification under the SPCF and Notification (Amended 12-12-2022)</i>
PEFC PT 1003:2022	<i>Requirements for the qualification of auditors conducting PEFC SFM or CoC certification (withdrawn during the assessment)</i>
PEFC PT 1004:2022	<i>General Procedure for Claims and Disputes Resolution</i>
PEFC PT 1005:2022	<i>Requirements for Certification Bodies operating Forest Management Certification against the Portuguese Standard NP 4406 (Amended 12-12-2022)</i>
PEFC PT 1009:2022	<i>General Procedure for Issuance PEFC Trademarks Licences</i>
PEFC PT GUIA 1002:2022	<i>Guide for the Recognition of PEFC Specific Training Courses</i>

Adopted PEFC Council's documentation

PEFC ST 2001:2020	<i>PEFC Trademarks Rules – Requirements</i>
PEFC ST 2002:2020	<i>Chain of custody of forest and tree based products - Requirements</i>
PEFC ST 2003:2020	<i>Requirements for certification bodies operating certification against the PEFC chain of custody standard</i>

Other documentation and guidance

IMP08-02	<i>Notification contract with certification bodies</i>
CFFP DOC 1002:2022	<i>Development report on the scheme revision</i>
TC OR 145	<i>Operating Rules of Technical Commission 145 (ICNF)</i>
CFFP DOC 1001:2009	<i>Statutes of the Conselho da Fileira Florestal Portuguesa</i>
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)

- [1] Minutes of TC 145 (4 April 2019)
- [2] Stakeholders mapping table
- [3] Response to the assessor's request for additional information (27 October 2022)
- [4] Directory of the records keeping (files relevant to 2014 revision)
- [5] PROJECT SYNOPSIS REVISION OF THE PORTUGUESE STANDARD 4406:2014
- [6] Minutes of the TC 145 meeting, No 98 (4 April 2019)
- [7] [Public announcement of the start of the revision process at the PEFC Portugal website \(29 Oct 2022\)](#)
- [8] Letter of INCF – announcement of the start of the revision process (24 October 2019)
- [9] Email communication INCF - announcement of the start of the revision process (24 October 2019)
- [10] Email communication INCF – reminder announcement of the start of the revision process (24 October 2019)
- [11] [PEFC Portugal website: Description of the stakeholders participation](#)
- [12] [TC 145 Procedures \(OR TC 145\) available at the PEFC Portugal website](#)
- [13] Minutes of TC 145 meeting (3 December 2019)
- [14] List of TC 145 members
- [15] List of TC 145, SC 2 and WG meetings
- [16] Invitation – email to TC 145 No 101 (21 February 2022)
- [17] Invitation – email to SC 2 (7-8 October 2021)
- [18] Invitation – email to SC 2 (8-9 February 2022)
- [19] Invitation – email to WG 1 (4 March 2021)
- [20] Minutes WG 1 (4 March 2021)
- [21] Minutes SC 2 (8-9 February 2021)
- [22] Minutes SC 2 (7-8 October 2021)
- [23] Minutes TC 145, No 101 (21 February 2022)
- [24] Minutes TC 145, No 101 (7 March 2022)
- [25] Email - distribution Minutes WG 1 (4 March 2021)
- [26] Email - distribution Minutes SC 2 (7-8 October 2021)

- [27] Email - distribution Minutes SC 2 (8-9 February 2021)
- [28] Email - distribution Minutes TC 145 , No 101 (7 March 2022)
- [29] Minutes TC 145, No 100 (22 October 2021)
- [30] Evidence on using Team tool for the management of TC 145/ SC2
- [31] SSB / INCF announcement of public consultation - website
- [32] Letter communication to disadvantaged stakeholder (14 October 2021)
- [33] E-mail communication PEFC Portugal to NSB (IPQ)re public consultation
- [34] PEFC Portugal / NSB – IPQ announcement of public consultation - website
- [35] [PEFC Portugal announcement of public consultation - LinkedIn](#)
- [36] [Announcement of the public consultation at the NSB / IPQ Newsletter](#)
- [37] Synopsis of comments from public consultation
- [38] Report from ToF pilot testing
- [39] [Announcement of the pilot test \(LinkedIn of PEFC Portugal\)](#)
- [40] Formal approval of NP 4406 by IPQ
- [41] Publication of NP 4406 – announcement PEFC Portugal website
- [42] Communication of NP 4406 approval to TC 145 members
- [43] Publication of the PEFC Portugal scheme at the PEFC Council website
- [44] [Publication of the NP 4406 at the IPQ website](#)
- [45] [Information on participation in CT 145 at PEFC Portugal website](#)
- [46] [Information on role and participation in CT 145 at the INCF website](#)
- [47] GAP analysis PEFC ST 1002, Group certification
- [48] GAP analysis PEFC ST 1003, ToF
- [49] GAP analysis PEFC ST 1003, SFM
- [50] Membership in TC 145 (Excel file), submitted and valid as of January 2023
- [51] Posts at the PEFC Portugal Facebook on public consultation (16 November 2021 and 17 November 2021)
- [52] NP 4406, Portuguese official version, p.1-2
- [53] Publication of the [Development report](#) at the [PEFC Portugal website](#)
- [54] PEFC Portugal's response to the draft interim report (January 2023)

7 Methodology and timetable

7.1 Scope of the assessment

The assessment was carried out based on PEFC GD 1007:2017, the tender dossier of 1 July 2022 and the TJConsulting's tender proposal of 25 July 2022.

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 during online stakeholders interviews.

7.2 Assessment process

Table 1 describes the assessment process that is based on and fully conforms to PEFC GD 1007, the tender dossier of 1 July 2022 and the TJConsulting's tender proposal of 25 July 2022.

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	3 Oct 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	3 Oct - 12 Nov 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	12 Nov 2022 – 9 Jan 2023 ³
In-country visit	In-country visit and interview of the applicant's staff / key persons/stakeholders	A report on the in-country visit	14 – 18 Nov 2022

³ Due to illness of key personnel of PEFC Portugal, the assessor and PEFC Portugal agreed to postpone the comment period until 9 January 2023.

Stage	Description	Output	Time / Period
Stage 2 assessment	Stage 2 covered consideration of the applicant's responses as well as comments received from the PEFC international public consultation	Final draft report	9 Jan 2023 – 14 March 2023 ⁴
Stakeholders consultation	TJConsulting analysed stakeholders' comments resulting from direct invitation of Portuguese stakeholders	Final draft report	3 Oct 2022 – 31 Dec 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	14 March 2023 – 18 April 2023
Consideration of the PEFC Council's comments	TJConsulting considered and provided responses to individual comments and will amend the report where applicable.	Final report (including an appendix on the internal review)	18 April 2023 – 3 May 2023

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.

⁴ Following the PEFC Council request to consider outcomes of the PEFC Council's Task Force on TOF, the second stage assessment and delivery of the final draft report was postponed until the delivery of the outcomes.

8 Assessment

8.1 General analysis of the structure of the scheme

The scheme documentation

The scheme documentation includes the NP 4406 standard and additional documents (PEFC PT 1001-1009).

The documents' scope is clearly defined based on key process of the certification scheme (see the tables below)

Normative documents (governed by IPQ)

NP 4406:2022	<i>Portuguese Standard for the Sustainable Forest Management Systems - Application of the pan-European criteria for sustainable forest management</i> <i>Other procedural documentation for the management of the national standardisation body and sectorial standardisation bodies.</i>
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Normative documents (governed by ICNF)

TC OR 145	<i>Operating Rules of Technical Commission 145 (ICNF)</i>
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Normative documents (governed by PEFC Portugal)

PEFC PT 1001:2022	<i>Portuguese Forest Certification Scheme – Technical Reference</i>
PEFC PT 1002:2022	<i>General Criteria for Accreditation of Certification Bodies operating certification under the SPCF and Notification</i>
PEFC PT 1004:2022	<i>General Procedure for Claims and Disputes Resolution</i>
PEFC PT 1005:2022	<i>Requirements for Certification Bodies operating Forest Management Certification against the Portuguese Standard NP 4406</i>
PEFC PT 1009:2022	<i>General Procedure for Issuance PEFC Trademarks Licences</i>
PEFC PT GUIA 1002:2022	<i>Guide for the Recognition of PEFC Specific Training Courses</i>

Normative documents (developed by the PEFC Council and adopted by PEFC Portugal)

PEFC ST 2001:2020	<i>PEFC Trademarks Rules – Requirements</i>
PEFC ST 2002:2020	<i>Chain of custody of forest and tree based products - Requirements</i>
PEFC ST 2003:2020	<i>Requirements for certification bodies operating certification against the PEFC chain of custody standard</i>

Process	Scheme documentation	
Standard setting	TC OR 145	Other IPQ's documentation for the development on national standards and management of the national standardisation body and sectorial standardisation bodies
Forest management / ToF	NP 4406	
Group forest certification	NP 4406	
Chain of custody	PEFC ST 2002	
PEFC Trademark usage	PEFC ST 2001	PEFC PT 1009
Certification and accreditation	PEFC PT 1002 PEFC PT 1005 PEFC ST 2003	PEFC PT GUIA 1002

Organisational arrangement

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

IPQ	<p>The National Standardisation Body (NSB)</p> <p>The forest management standard NP 4406 has been developed as a national standard. The standardisation process is governed by the IPQ (the national standardisation body for Portugal). The standardisation process for NP 4406 is conducted by the ICNF (the Sectorial Standardisation Body).</p> <p>The role of the IPQ is:</p> <ul style="list-style-type: none"> - To commence the standardisation work and formally approve the national standard(s); - Overall governance and supervision of the standardisation process; - To approve and supervise the Sectorial standardisation body (ICNF); - To manage a formal public and stakeholder consultations.
ICNF	<p>The Sectorial Standardisation Body (SSB)</p> <p>A body recognised by the IPQ to manage the standardisation process for NP 4406 and other forest related standards.</p> <p>For the purposes of the NP 4406 development, the ICNF establishes Technical Committee 145.</p>

PEFC Portugal	<p>The scheme owner</p> <ul style="list-style-type: none"> - Supports the development of the NP 4406 standard and work of TC 145 (specific tasks dedicated to PEFC Portugal by OR TC 145); - Develops and manages the scheme; - Notifies (formally recognises) the certification bodies; - Issues the PEFC Logo licenses in Portugal.
Certification body	<p>Certification bodies are responsible for auditing forest management and chain of custody and issuance of 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 EA/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>PEFC Netherlands requires the accreditation body to be a member of the EA/IAF.</p>
Forest (ToF) owner / management company / group of forest owners	<p>Forest (ToF) owners / managers are responsible to implement the forest management standard and to 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>

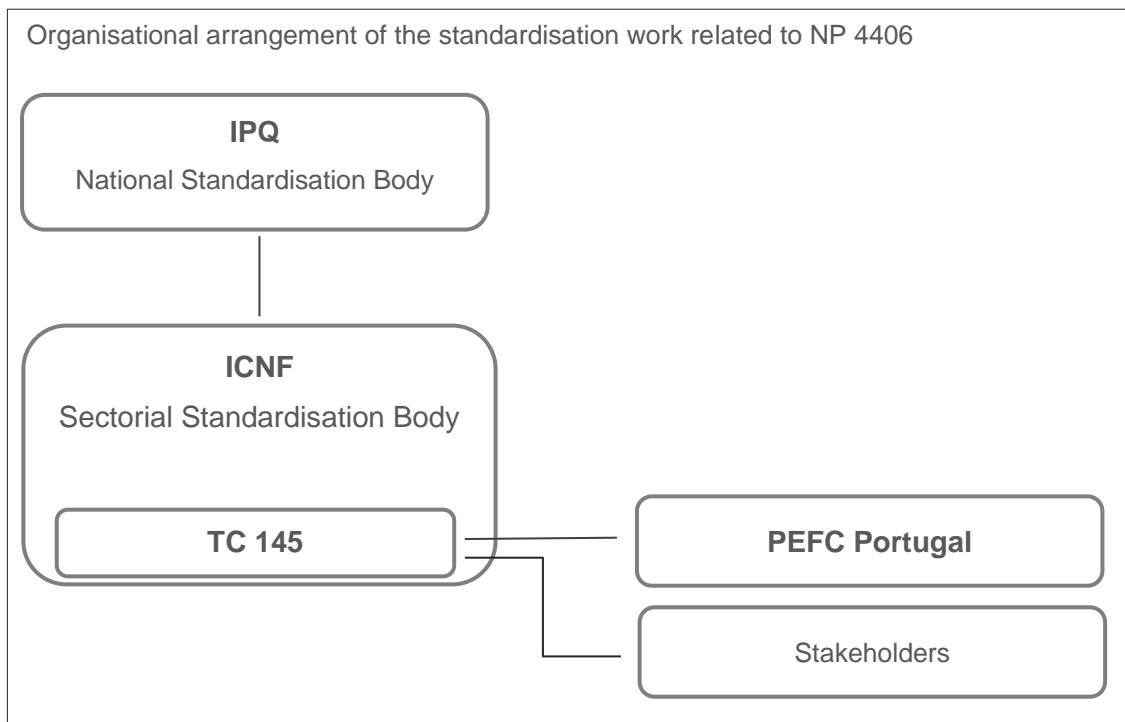
8.2 Assessment of requirements for standard setting

8.2.1 Assessment of the organisation of the standard setting

The forest management standard (NP4406) has been developed and is managed by the IPQ, the National Standardisation Body established by a Portuguese government that is responsible for the development and governance of the official Portuguese national standards. The IPQ is a member of the CEN and ISO.

For the purposes of the development of sector specific standards, the IPQ recognises Sectorial Standardisation Bodies (SSB). For the purposes of the development of the NP 4406 standard, the IPQ approved the ICNF as the SSB. The ICNF as established, in compliance with the IPQ rules and procedures, the Technical Committee TC 145 that allows access of relevant stakeholders. The Technical Committee is also responsible for the development of other forest-related standards (e.g. FSC) that are not linked with the PEFC Portuguese scheme.

PEFC Portugal plays a support function in the development of the NP 4406 standard by conducting specific tasks defined by the ICNF (OR TC 145), especially in identification of stakeholders (stakeholders mapping), dissemination of information amongst stakeholders, support in administration of TC 145, coordination of the TC 145 working groups and task forces, analysis, pilot testing, etc. PEFC Portugal is adopting the NP 4406 as a part of the PEFC Portuguese scheme and governs further documents needed for the scheme operation.



8.2.2 Assessment of the standard setting procedures

A. Procedures for the standard setting process

The standard setting and revision process governed by the IPQ is governed by multiple procedural documents that have been developed and are governed by the respective organisations involved in the standard setting process.

IPQ	ICNF (CT 145)	PEFC Portugal
RPNP 010/2020	OR TC 145	PEFC PT GUIDE 1005
RPNP 030/2020		
RPNP 040/2020		
RPNP 041/2020		

The IPQ's documentation is focused on the whole process and is the highest-level documentation in the hierarchy of the procedural documents. The documentation is valid for any standardisation activity that is governed by the IPQ and covers:

- Recognition and qualification of sectorial standardisation bodies (RPNP 010/2020);
- Work of the Technical Committees (RPNP 030/2020);
- Approval, homologation and publication of normative documents (RPNP 040/2010);
- Structure, format and content of normative documents (RPNP 041/2019).

In addition, the IPQ has also developed multiple forms for recording and reporting within the standardisation process.

The ICNF (TC 145) documentation (OR TC 145) mainly focuses on the work of the Technical Committee 145 as the consensus building body but also describes some elements for which the primary responsibility lies with the IPQ. It is expected that the purpose of those provisions was to ensure compliance with the PEFC and FSC requirements.

The PEFC Portugal documentation (PEFC PT GUIDE 1005) is focused on identification and communication with stakeholders and other elements needed to respond to specific PEFC Council requirements.

The evaluation has mainly been based on OR TC 145. However, also other documentation has been taken into consideration where compliance with the PEFC Council requirements could not be solely established by the OR TC 145 document.

B. Results of the assessment of the standard setting procedures

OR TC 145, IPQ documentation and other supporting documentation relevant to the standard-setting **comply** with the PEFC requirements, except the following minor non-conformities:

PEFC requirement	PEFC ST 1001:2017, 6.1.1 a-d, 6.1.2 Procedures: Standard Proposal
No.	1
Type	Minor non-conformity
Description	<p>The IPQ Procedures RPNP 030/2020 requires the Technical Committee to develop a Standardisation Programme, a plan of activities and description of the standardisation process, including phases, deadlines and responsibilities. This approach is compatible with the “Project Proposal” of PEFC ST 1001:2017.</p> <p>Proposals for new standards and proposed revision of existing standards shall be communicated to the IPQ using a predefined form (Mod-DNOR-01-01, Mod-DNOR-01-14).</p> <p>The minor non-conformity has been assigned based on the fact that RPNP 030/2020 does not define the content of the “Standardisation Programme”, except for “phases, deadlines and responsibilities” and the referenced Forms that could potentially resolve the identified non-conformities have not been submitted for the assessment.</p>

PEFC requirement	PEFC ST 1001:2017, 6.5.1g Procedures: Availability of comments from public consultation
No.	2
Type	Minor non-conformity
Description	<p>The procedures (OR TC 145) require the synopsis on the comments and their consideration to be made available at the website. It requires to prepare a report on comments received during the public consultation and their justification. TC 145 shall then prepare a document on the standard setting process that also includes compilation of comments received, result of their evaluation; and make this document publicly available.</p> <p>The procedures of the IPQ (NSB, 040/2010) that are binding to the SSB and TC 145, also allow the stakeholders commenting on the standard to be invited to the TC meeting considering the comments. The PEFC Portugal's procedures (PEFC PT GUIDE 1005) allow the report on the comments to be sent directly to stakeholders who commented the standard.</p> <p>The minor non-conformity is based on the fact that neither the SSB procedures (OR TC 145) nor the NSB procedures (040/2010) ensures that the “synopsis of received comments and their consideration” are sent directly to the stakeholders making comments. The PEFC Portugal procedures (PEFC PT GUIDE 1005) introduces this requirement with the verb “may” which does not make it compulsory and only gives it as an option “either to publish at the website / social media or to be sent directly”.</p>

8.2.3 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 October 2019 (preparation phase) and May 2022 (formal publication of the forest management standard, NP 4406).

Following PEFC ST 1001:2017, the assessment is only focused on the development of the forest management standard, respectively ToF requirements (NP 4407). Development of other documentation and standards of the PEFC Portuguese scheme is outside the scope of this assessment.

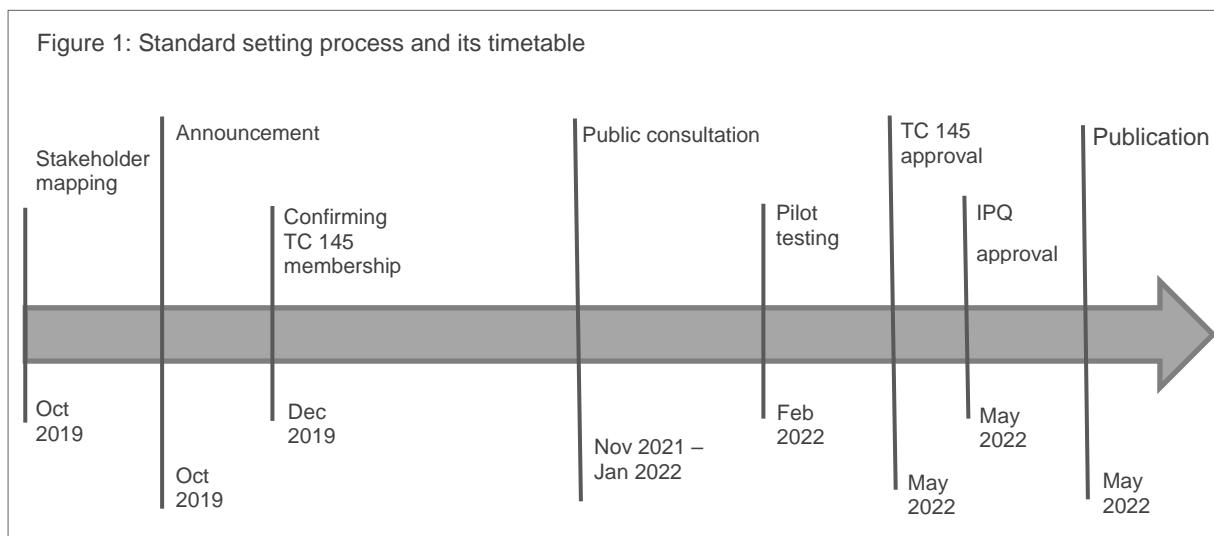
Standard setting process

The standard setting (revision) process formally started by development of a standard proposal and stakeholders mapping exercise that was carried out by TC 145, respectively PEFC Portugal on its behalf in October 2019.

This step was followed by the formal announcement of the process start that was presented at the PEFC Portugal's Netherlands' website and social media on 28 October 2019. The announcement was also communicated by a letter/e-mail of 24 October 2019 that was sent to all stakeholders identified in the stakeholders mapping.

The process was completed by the formal approval of the forest management standard (NP 4406) on 10 May 2022 followed by its publication on 16 May 2022.

The stages of the process and its timetable is shown in figure 1:



Stakeholders mapping

In October 2019, PEFC Portugal conducted, on behalf of TC 145, an extensive stakeholders mapping that identified relevant stakeholder categories and a large number of individual stakeholders belonging to those categories. The number in brackets shows a number of identified stakeholders under each category:

- Industries and Trade (96),
- Forest Owners Organisations (217),
- Small and medium enterprises (25),
- Public administration (130),
- Consumers (2),
- Consumer social group (4),
- Labor (4),
- Research centers and higher education institutions (121),
- Managing and Implementation of the standards (69),
- Non-governmental Organisations (131),
- Non-governmental Environmental Protection Organisations (154).

The stakeholders mapping also identified key stakeholders and disadvantaged stakeholders categories. The standardization body was addressing communication constraints of the identified stakeholders by using different communication channels and providing internet solution to one stakeholder.

Announcement of the standard setting process

The announcement of the start of the NP 4406 standard has been made by:

- a) News at the PEFC Portugal website^[7] (28 October 2019);
- b) Letters / Emails distributed to all stakeholders identified in the stakeholders mapping exercise sent on 24 October 2019^[8, 9].
- c) Reminder email distributed to all stakeholders on 21 November 2019^[10].

The announcement at the website^[7] and the announcement/invitation letter^[8,9] included brief description of the revision process and its organisational structure. They both made reference to the synopsis of the revision process^[5] that provides detailed description of the revision process, including its timetable; description of the stakeholders opportunities to participate in the process; an invitation to participate in TC 145; an invitation to submit comments to the proposed revision process as described in the Synopsis^[5]; and provided an access to standard setting procedures (OR TC 145).

Technical Committee TC 145

Technical Committee 145 is a permanent committee that serves as a consensus building body for the NP 4406 standard but also other standards (e.g. an FSC forest management standard for Portugal). Based on the announcement/invitation^[7, 8, 9, 10], the TC 145 accepted, on 3 December 2019) all received nominations and reconvened the permanent Technical Committee TC 145^[12].

The TC consists of 73 voting members plus Chairman with balance amongst the defined categories. In addition, TC 145 also includes a large number on “non-voting members”, usually additional representatives of the voting member organisation:

- Industries and Trade (A), incl. forest owners - 25,
- Small and medium enterprises (A1) - 7,
- Public administration (B) - 13,
- Consumers (C) – 0 (one non-voting),
- Labor (D) - 0,
- Research centres and higher education institutions (E) - 9,
- Managing and Implementation of the standards (F) - 10,
- Non-governmental Organisations (G) - 3,
- Non-governmental Environmental Protection Organisations (G1) - 5.

All members of TC 145 are considered as having expertise in SFM and particular expertise in their particular field of interest. A large number of participants in categories A, B, F are those affected by the implementation of the standard.

The representation of stakeholders in TC 145 has prevailing economic interest (A, B) that significantly outnumbers stakeholders in other categories, especially C-G. The functioning of Technical Committees under the Portuguese national standardization (as defined by RPNP 030/2020) does not limit a number of members of the TCs representing different stakeholder categories. This provides increased opportunity for stakeholders interested in the process to participate but, at the same time, brings challenges relating to a large number of TC members affiliated to some stakeholder categories. To resolve this challenge, RPNP 030/2020 requires the Chairman of Technical Committees to ensure that all views are properly presented, to mediate different positions to achieve a consensus and to ensure representativeness and effectiveness of the Technical Committee (RPNP 030/2020, 8.4.3).

A minor non-conformity has been assigned based on lacking participation of an organization representing trade unions and workers' interest. PEFC Portugal has not presented evidence that would demonstrate that PEFC Portugal's or TC 145 implemented proactive actions to contact the stakeholders within the category D and encourage their participation.

The membership of TC 145 is shown in Annex F.

TC 145 further established several subcommittees (SC) and working groups (WG) that allowed detailed discussion of various topics within the TC 145 membership. Only SC 1, 2, 3, and 9 are relevant to the revision of the NP 4406 standard.

Structure of TC 145			
SC 1	Vocabulary, terms and definitions		
SC 2	Forest management standard (PEFC)	WG 1	Criteria and Indicators
		WG 2	SFM requirements
		WG 3	Non-wood forest products and ecosystem services
		WG 4	Regional and Group Certification
		WG 5	ToF requirements
		WG 6	Applicable legislation
		WG 7	Guides r, references and Coode of Good Practices
		WG 8	Internal monitoring programme
SC 3	Comparative analysis PEFC and FSC		
SC 4	Chain of Custody		
SC 5	FSC forest management standard		
SC 6	FSC group certification		
SC 7	FSC Controlled wood		
SC 8	SBP (Sustainable Biomass Partnership) risk assessment		
SC 9	Archaeological monuments		

Open and transparent work of TC 145

During the revision process, TC 145 met 5 times, including preparatory meetings on 4 April 2019 and 3 December 2019.

- 4. April 2019 (No. 97),
- 3 December 2019 (No. 98),
- 7 March 2021 (No. 99, not related to NP 4406),
- 22 October 2021 (No. 100),
- 21 February 2022 (No. 101),

In addition, Subcommittee on NP 4406 (SC2) was responsible for preparing working documents of NP 4406 and met 7 times:

- 7 January 2020,
- 30 June 2020,
- 3 September 2020,
- 7 October 2020,
- 8 October 2020,
- 8 February 2022,
- 9 February 2022.

In addition, to TC 145 and SCs, several WGs were established to discuss particular issues met on numerous occasions^[15].

Summary of the TC 145 work:

- TC 145, SCs and WGs had several meetings that were sufficient in numbers to discuss and negotiate the NP 4406 standard;
- The work of TC 145 as well as Sub-committees and Working Groups was professionally managed and administratively supported by PEFC Portugal;
- Prior to meetings, the members of TC 145, subcommittees and also working groups received a written invitation (e-mail) to the meetings with an agenda and documentation associated to the meetings;
- The meetings provided members with opportunities for meaningful contributions. TC 145 and each of SCs had their elected Chairperson that were responsible for facilitating the meetings and discussion. They were well supported by ICNF (the Secretariat) as well as by PEFC Portugal that was particularly responsible for preparing new draft documents based on outcomes of the meetings;
- The outcomes of the meetings were recorded in minutes and communicated to the members of the respective bodies.

Public consultation

The public consultation was formally organised by the IPQ (NSB) and that took place from 15 November 2021 to 14 January 2021 (60 days). The public consultation has been announced by the following means:

- a) at the PEFC Portugal website on 15 November 2021^[34],
- b) at the NSB / IPQ website^[34],
- c) at the SSB / ICNF website on 3 December 2021^[31],
- d) At the PEFC Portugal LinkedIn profile^[35]
- e) at the NSB/ IPQ Newsletter^[36],
- f) at PEFC Portugal Facebook^[51].

The draft standard was made publicly available for the purposes of the public consultation and was clearly referenced in the announcement.

PEFC Portugal has not sent a direct mail or letter with an invitation to public consultation on the NP 4406 standard to stakeholders identified in the stakeholders mapping. However, it should be noted that PEFC Portugal and IPQ communicated the public consultation via social media (LinkedIn and Facebook) with reach to more than 1500 stakeholders. The social media is an appropriate communication channel to stakeholders and has a similar effect as direct mailing although this tool cannot guarantee that all stakeholders identified in the stakeholders mapping have been contacted.

SC 2 and TC 145 considered comments received from public consultation and outcomes of this consideration was made available to parties submitting the comments.

Pilot testing

The applicant has organised pilot testing of TOF requirements, a new element of the NP 4406 standard on 15 February 2022^[38, 39].

The pilot test was conducted on the area managed by Municipality of Lousada (Lousada Environment-Sector of Nature Conservation and Environmental Education in partnership with VERDE- Association for Integrated Nature Conservation, co-manager of the Green Giants Project). The property is a member of a group certificate of The Unimadeiras S.A., manager of the sustainable forest management certificate (APCER/2012/GFS.0005).

The pilot test was conducted by APCER, the certification body, and the Ks solutions, coordinating body of the working group responsible for the development of the requirements of Trees Outside the Forest (GT5 of SC 2 / TC 145).

The pilot test did not result in material changes to the NP 4406 standard.

Approval of the standards by consensus (at the TC 145 level)

Following the TC 145 procedures (OR TC 145), TC 145 makes consensus-based decisions in two stages. Firstly, it shall approve a draft standard to be submitted to public consultation (and pilot testing) and then secondly, it shall approve a final standard to be sent to IPQ final approval.

The decision of TC 145 to submit a draft standard NP 4406 for public consultation was made at the TC 145 meeting No. 100 held on 22 October 2021^[29]. The decision was made with 39 votes in favor and 3 abstention.

The decision of TC 145 to submit a draft standard NP 4406 for formal approval to IPQ was made at the TC 145 meeting No. 101 held on 21 February 2022^[23]. The decision was made with 29 votes in favor and 3 abstention (34 voting members).

Formal approval of the SFM standard and its publication

TC 145 reached consensus on the draft NP 4406 standard at its meeting No 100 and then No 101^[23, 29]. NSB / IPQ formally approved the NP 4406 standard on 10 May 2022^[40] and published it on 16 May 2022.

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	<p>PEFC ST 1001:2017, 6.4.2a Process: Balanced representation of stakeholders</p> <p>PEFC ST 1001:2017, 6.4.3 Process: Participation of key stakeholders</p>
No.	3
Type	Minor non-conformity
Description	<p>TC 145 covers a large number of stakeholders (73) that are divided into individual stakeholder categories. TC 145 allows participation of all interested stakeholders and does not provide any quorum for individual stakeholder categories.</p> <p>Information on individual members and their affiliation to a specific stakeholder category, Sub-committees and Working Groups is kept in an information system that has been developed and is administered by the IPQ.</p> <p>It should be noted that the TC 145 is always open to new members and also existing members can leave the Technical Committee. Therefore, the number of the members is changing in time.</p> <p>Minor non-conformity has been assigned based on lacking participation of an organization representing trade unions and workers' interest.</p> <p>It should be noted that the minutes of the TC meeting 98^[13] includes information that one member of TC 145 has been classified under stakeholder category D (trade unions and workers). However, a formal list of members of TC 145^[50] does not include an organization representing trade unions or workers' interest classified under stakeholder category D and even from the list of the TC 145 it is not evident that some member organization would represent workers' interest (See Annex F).</p> <p>PEFC Portugal has not presented evidence that would demonstrate that PEFC Portugal's or TC 145 implemented proactive actions to contact the stakeholders within the category D and encourage their participation, except the initial invitation of stakeholders to join the Technical Committee.</p> <p>The issue of balanced representation and participation of key relevant stakeholders was discussed during the in-site visit to Portugal and all interviewed stakeholders confirmed that, from their perspective, all relevant stakeholders participated in the process and the representation was balanced.</p>
PEFC requirement	<p>PEFC ST 1001:2017, 6.5.1b, c Process: Public consultation – direct mailing, invitation of disadvantaged/key stakeholders</p>
No.	4
Type	Minor non-conformity

Description	<p>PEFC Portugal has not sent a direct mail or letter with an invitation to public consultation on the NP 4406 standard to stakeholders identified in the stakeholders mapping.</p> <p>However, it should be noted that PEFC Portugal and IPQ communicated the public consultation via social media (Linkedin and Facebook) with reach to more than 1500 stakeholders. The social media is an appropriate communication channel to stakeholders and has a similar effect as direct mailing although this tool cannot guarantee that all stakeholders identified in the stakeholders mapping, including key and disadvantaged stakeholders have been contacted.</p> <p>PEFC Portugal also argues that an extensive communication was made at the beginning of the process when stakeholders were contacted by direct mailing and information about the standard setting process also described foreseen public consultation.</p>
PEFC requirement	PEFC ST 1001:2017, 7.2.2 c Process: Identification of the official language on the standard
No.	5
Type	Minor non-conformity
Description	<p>NP 4406 (English version submitted for the PEFC endorsement) does not include a statement that the English version is decisive.</p> <p>PEFC Portugal presented for the PEFC endorsement a translated version of NP 4406. However, the front page of the NP 4406 standard (in Portuguese language)^[52] with identification of the IPQ (in Portuguese language)^[52] as the standardisation and the IPQ's own copyright claim has been replaced by the PEFC Portugal by its own design and reference to PEFC Portugal.</p> <p>The only official version the standard is the Portuguese version, officially published by the IPQ and included in the IPQ's Portuguese normative collection. The role of the PEFC Portugal's English version will solely serve the purpose of the PEFC endorsement.</p> <p>It should be noted that the conformity assessment bodies, both certification and accreditation bodies will only make reference to the official Portuguese standard as adopted and published by the IPQ. Those bodies will neither consider the English (PEFC Portugal's) version of the standard in the evaluation nor in case of resolving any apparent complaint relating to discrepancies between the Portuguese and English version. This position has been confirmed by both IPQ and IPAC (the accreditation body) during face-to-face interviews during the in-country visit.</p> <p>It should be noted that the IPQ's procedures allow publication of English versions of its standards based on requests of the NSB, respectively the T (RPNP 040/2010). However, it is likely that this decision would have an impact on possibility to make the standard freely available at the PEFC Portugal website.</p> <p><i>"4.5 Approval of Portuguese standards</i></p> <p><i>After having ensured that all applicable procedures have been followed, the NSB approves and homologates the aNP or prNP as NP that become part of the Portuguese normative collection.</i></p>

	<p>4.6 English version of Portuguese standards</p> <p><i>English versions of Portuguese standards must be prepared, whenever the CT deems relevant and important for the development of normative work at the level European or international, or when the market so requires. These English versions are approved by the NSB and integrated into the Portuguese normative collection, maintaining the year of the original normative document”.</i></p>
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PEFC requirement	PEFC ST 1001:2017, 7.2.2 d Process: Identification of the “review date on the standard”
No.	6
Type	Minor non-conformity
Description	<p>The English version of the NP 4406 standard makes reference to the “NGB revision by date: 2027-05-10”</p> <p>The English version of the NP 4406 standard refers to a five years cycle between the approval of the standard and the next revision. This is consistent with the maximum five years cycle between the approval and review of the standard required by PEFC ST 1001:2017.</p> <p>The minor non-conformity has been assigned based on the fact that the term “NGB revision by date: 2027-05-10” is rather unclear and ambiguous as it is not clear whether the standard revision will start at this date or will be completed by this date. In addition, the PEFC requirement refers to the “review date” that is interpreted as a period when the “review process starts” and is then followed by the “revision” process.</p>

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

Observation – Representation of stakeholders in TC 145

The representation of stakeholders in TC 145 has prevailing economic interest (A, B) that significantly outnumbers stakeholders in other categories, especially C-G.

The functioning of Technical Committees under the Portuguese national standardization (as defined by RPNP 030/2020) does not limit a number of members of the TCs representing different stakeholder categories. This provides increased opportunity for stakeholders interested in the process to participate but, at the same time, brings challenges relating to a large number of TC members affiliated to some stakeholder categories.

To resolve this challenge, RPNP 030/2020 requires the Chairman of Technical Committees to ensure that all views are properly presented, to mediate different positions to achieve a consensus and to ensure representativeness and effectiveness of the Technical Committee (RPNP 030/2020, 8.4.3).

Observation – Portuguese and English version of the NP 4406 standard

PEFC Portugal presented for the PEFC endorsement a translated version of NP 4406. However, the front page of the NP 4406 standard (in Portuguese language)^[52] with identification of the IPQ (in Portuguese language)^[52] as the standardisation body has been replaced by the PEFC Portugal by its own design and reference to PEFC Portugal. This could give a false and misleading impression that the standard has been developed and is governed by PEFC Portugal rather than the IPQ and that the PEFC Portugal has own a copyright over this standard.

However, it should be noted that the conformity assessment bodies, both certification and accreditation bodies will only make reference to official Portuguese standard as adopted and published by the IPQ. The role of the PEFC Portugal's English version will solely serve the purpose of the PEFC endorsement.

8.2.4 Stakeholders questionnaire and interviews

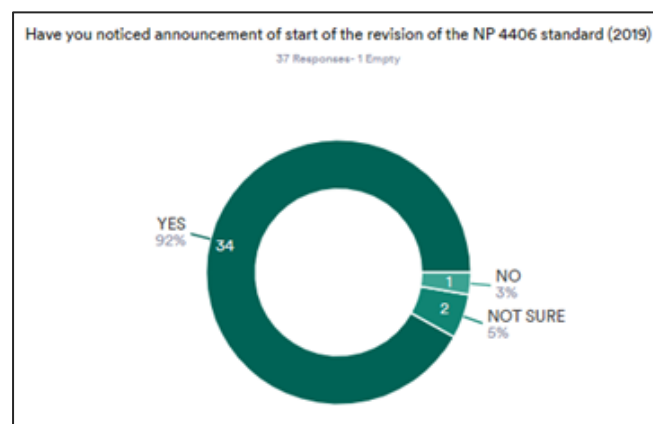
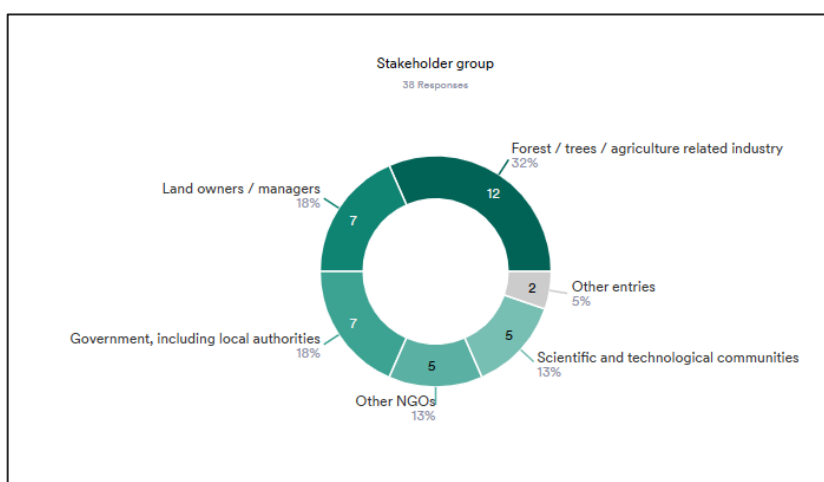
Stakeholder online survey

TJConsulting distributed an invitation to an on-line survey to Portuguese stakeholders with a request to provide feedback on the standard setting/revision process of the scheme.

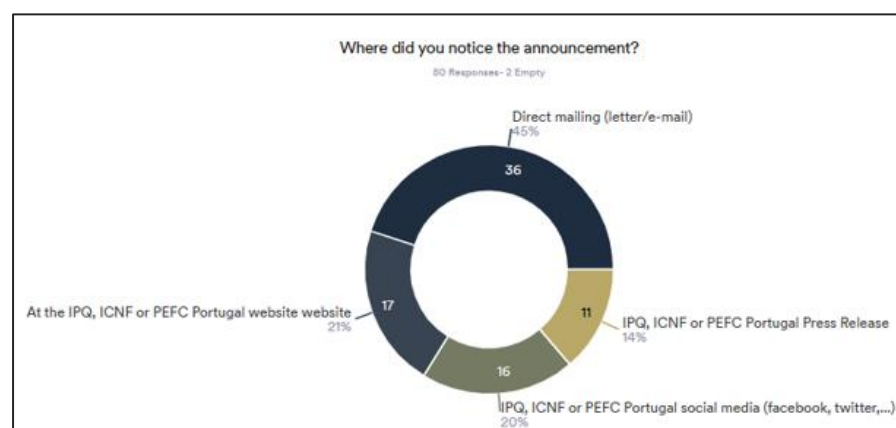
TJConsulting provided stakeholders with ten (10) weeks response period between 3 October 2022 to 31 December 2022. In addition, outcomes of personal interviews during the in-country visit were included in the questionnaire analysis.

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

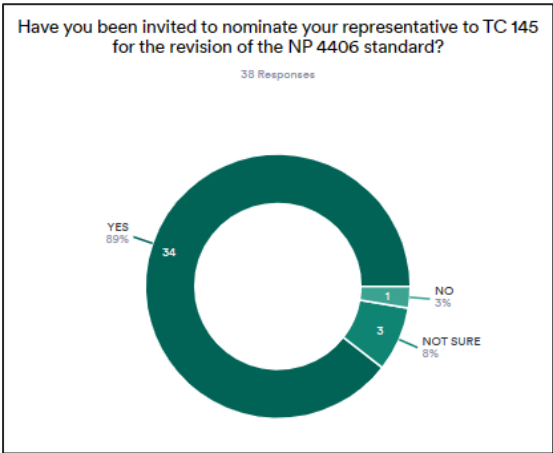
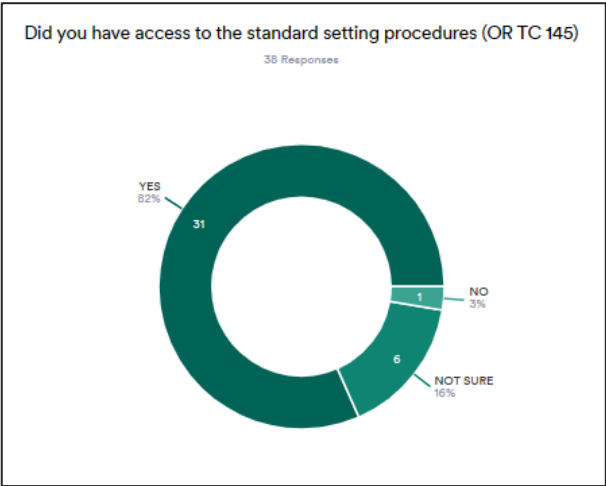
38 Stakeholders participated in the stakeholders online survey, 32 % represented forestry sector, both forest owners as well as forest industry.



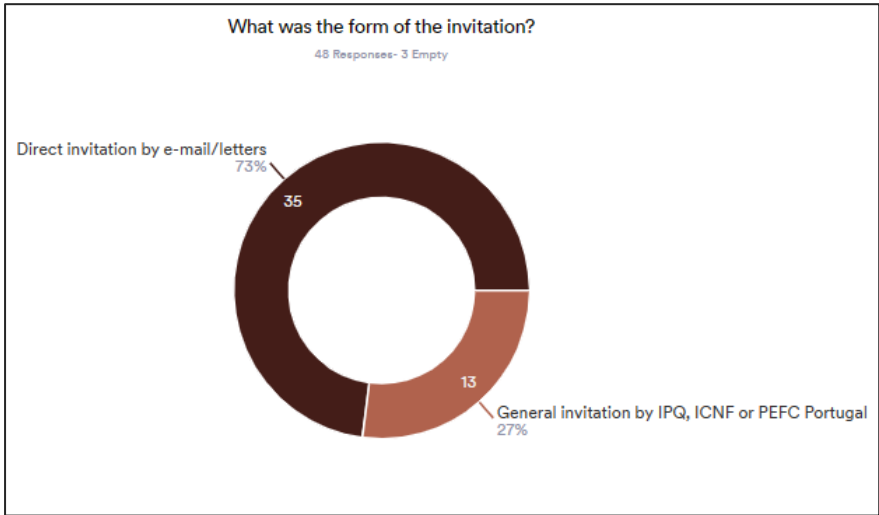
92 % of respondents noticed the announcement of the start of the process, mainly due to direct mailing (45 %).

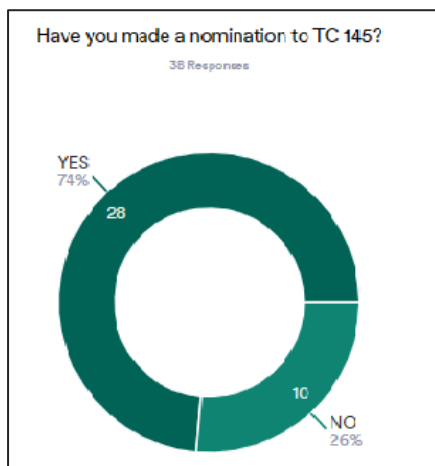


Majority of respondents reported that they had access to the standard setting procedures (82 %) that were made public by the ICNF, IPQ and PEFC Portugal.



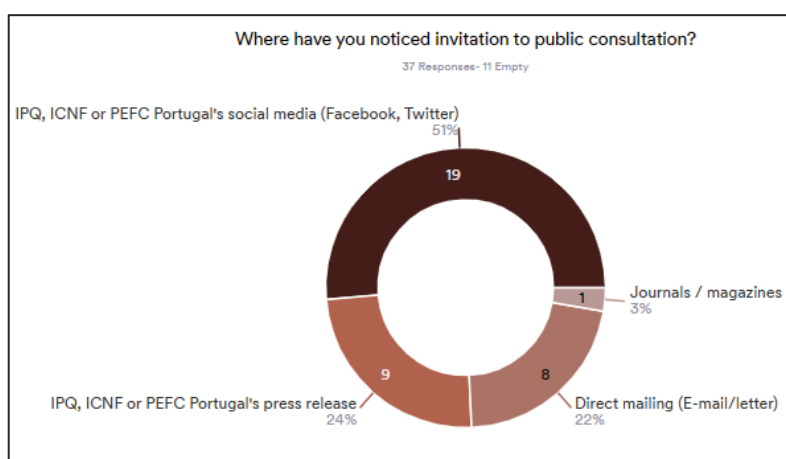
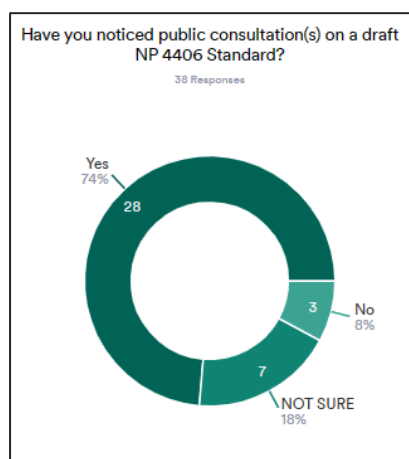
Majority of respondents stated (89 %) that they have been invited to nominate their representative to TC 145 that was responsible for revision of the NP 4406 standard. Mainly by direct mailing (73 %)





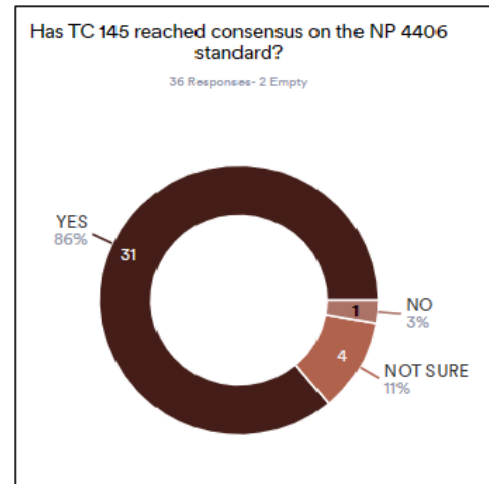
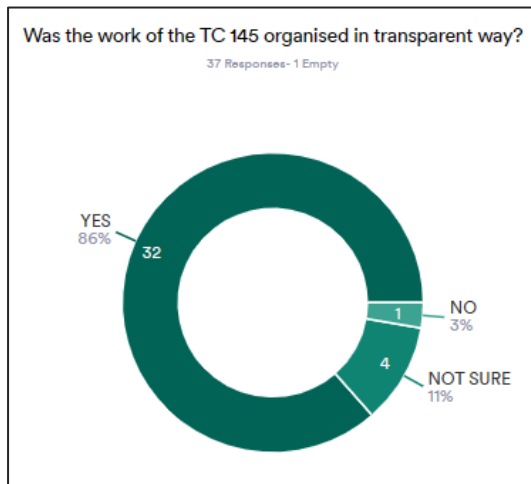
74 % of respondents indicated that they have nominated themselves for membership in TC 145 and all their nominations have been accepted.

74 % of respondents noticed the public consultation public consultation launched by the IPQ and communicated by the ICNF and PEFC Portugal. The social media were the most efficient communication channel. However, it should be noted that direct mailing has not been used to communicate the public consultation. None of the respondents reported that he/she would have submitted any contribution to the public consultation.



All respondents except one responded reported that they have not submitted any complaint. One respondent communicated unofficially that he was not happy with the standard setting process. The person in question has been interviewed during the in-country visit and written communication with PEFC Portugal has been reviewed. This revealed that PEFC Portugal used any possible means of communication and support to engage the person in the process. Unfortunately, the person did not reflect the offer.

Most of the respondents, mainly those that participated in Technical Committee 145, indicated that the work of TC 145 was transparent and that the Technical Committee reached consensus. One respondent was critical towards the work of TC 145. The stakeholder was interviewed during the in-country visit and communication of PEFC Portugal with this stakeholder was reviewed. The person was without internet access and in principle rejected any communication via electronic means. PEFC Portugal offered direct non-electronic communication but this offer was not reflected.



Stakeholders interviews

As a part of the in-country visit, the assessor interviewed key stakeholders with the following feedback to the revision process⁵:

- a) The invitation to TC 145 was done by direct mailing and by an announcement at the website;
- b) TC 145 membership was balanced and included all relevant stakeholders;
- c) TC 145 members were well supported by the TC 145 Secretariat and especially by PEFC Portugal, provided with good information and coordination service;
- d) The process included sufficient discussion and good / professional atmosphere;
- e) Consensus was reached, issues were resolved by discussion and voting was thus unanimous;
- f) Time for the process was sufficient;
- g) The standard was tested for its applicability in ToF certification.

The in-country visit report is shown in Annex J.

⁵ It should be noted that this is a summary of the feedback given by interviewed stakeholders that was taken into account in the assessment but does not need to fully correspond with the assessment conclusions for specific requirements.

8.3 Requirements for group certification

8.3.1 Introduction

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

The requirements for the group certification are directly included in the forest management standard as a model for implementation of forest management requirements.

The group certification model is based on a group of participants (owners/managers) that is managed and controlled by a “group manager”. Concerning the structure of the requirements for the group forest management certification, NP 4406 uses the ISO High Level Standard structure (HLS) for management systems. The requirements for group certification are defined in Annex B to NP 4406 and interprets the requirements of the core standard for the purposes of the group certification and defines additional requirements, mainly for specific responsibilities between the group entity and group participants.

The group requirements in NP 4406, and in particular in Annex B are largely identical to PEFC ST 1002:2018.

8.3.2 Group certification model

The approach but also wording for a vast majority of NP 4406 requirements concerning the group certification model is similar to PEFC ST 1002:2018.

The requirements for the **group entity** and its group management system contain:

- a) Context of the group organisation
- b) Leadership (including commitment and responsibilities)
- c) Planning
- d) Support (including stakeholders' identification, consultation and dispute settlement)
- e) Operation
- f) Performance evaluation (including monitoring, internal audits and management review)
- g) Improvement (including non-conformities management)

Internal monitoring programme

NP 4406 defines an annual internal monitoring programme in an identical way as PEFC ST 1002:2018.

Internal audit programme

Sample size: The size of the sample is defined as a square root of a number of participants ($y=\sqrt{x}$) that can be reduced by a factor of 0.6 based on results of the internal monitoring programme (only for one sample category).

Sample categories: To be defined based on a risk assessment basis.

Selection of the participants to the sample

25 % of the sample shall be selected randomly, for the rest PCSN II defines risk criteria.

Results of the evaluation

The scheme's requirements for group certification (NP4406) **comply** with the PEFC requirements (PEFC ST 1002:2018).

8.4 Forest management standard

8.4.1 Introduction and summary

Structure of the Standard

The requirements for the sustainable forest management are defined in NP 4406.

The document's structure is based on the ISO High Level Standard structure for management systems and PEFC ST 1003:2018.

The Standard includes three “mandatory/normative” Annexes:

- a) Annex A: Assessment indicators for organization's performance
- b) Annex B: Group or regional management organisations' requirements
- c) Annex C: Additional requirements applicable to trees outside forests (TOF)
- d) Annex D: Information sources.

The requirements of the core part of the NP 4406 standard are largely identical with PEFC ST 1003:2018 and the detail of the requirements does not exceed PEFC ST 1003:2018. Annex A provides specific indicators for evaluation of the core part requirements.

Concerning the specific performance requirements for sustainable forest management (chapter 8 Operation), the standard is based on six (6) criteria originating from the Pan European Operational Level Guidelines that are largely identical to PEFC ST 1003:2018.

Management cycle and continuous improvement

The standard includes requirements for forest management planning, including a cycle of inventory and mapping of forest resources, planning of forest management activities, implementation of prescribed activities and monitoring.

Compliance with legislation

The standard requires identification of and compliance with applicable legislation and defines the following areas of the legislation that are applicable to forest management:

- a. forest management practices;
- b. nature and environmental protection;
- c. protected and endangered species;
- d. property, tenure and land-use rights for local communities or other affected stakeholders;
- e. health, labour and safety issues;
- f. anti-corruption;
- g. the payment of legal obligations.

Trees outside Forests

The Standard allows certification of Trees outside Forests (ToF) and includes a dedicated Annex C for this subject. Following the approach of PEFC ST 1003:2018, the Standard does not define specific set of requirements for ToF but rather requires that the requirements of the core part of the document shall be used with modifications / interpretations that are defined in Annex C.

8.4.2 Assessment of the forest management standard

The forest management standard has been assessed against the PEFC Council requirements that are defined in PEFC ST 1003:2018. The following “summary” description of the compliance includes description of the scheme’s SFM standard requirements (NP4406) in relation with key areas of sustainable forest management defined by PEFC ST 1003:2018.

The report includes the following parts relating to the assessment of the Standards’ compliance with PEFC ST 1003:2018:

- a) Summary description of the Standards’ compliance with PEFC ST 1003:2018 is described in chapter 8.4.2.1;
- b) Assessment results are included in chapter 8.4.2.2;
- c) Detailed assessment of individual PEFC requirements, including assessment conclusion and justifications are included in Annex C to this report.

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

General requirements for forest management standards (PEFC ST 1003:2018, 4.1, 4.3.1, 4.3.2)

The standard includes clear and auditable requirements for FMU level, both management system (planning, monitoring, etc.) as well as performance-based requirements with specific indicators for forest operations (chapter 8). The standard records keeping (4.1d).

The standard requires identification of the scope of the management system (4.3.1) and the cycle of planning, implementation, monitoring and evaluation (PDCA cycle) and an appropriate assessment of social, environmental and economic impacts (4.3.2).

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

The standard states that the sales documentation shall include “PEFC claim recognized by the applicable certification system” (4.4.2). The definition of the term “PEFC claim” makes reference to the claim “100 % PEFC certified” or other system-specific claim recognised by the PEFC Council (3.1.4).

The Standard requires that the PEFC claim shall only be used for products originating in the certified area (4.4.3, 4.4.4).

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

The Standard requires to identify affected stakeholders, their needs and expectations (4.2).

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

The Standard requires publicly available commitment on compliance with the Standard and identification of responsibilities (5).

Planning (PEFC ST 1003:2018, 6)

The Standard requires to identify risk and opportunities (6.1.1); to conduct inventory and mapping of forest resources (6.2.1), defines requirements for periodically updated forest management plan and its content (6.2.1-6.2.6) and its public availability (6.2.7, 6.2.8).

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

The Standard requires identification of the relevant regulations (4.2.2.1). The Standard requires identification of the relevant regulations and defines areas of the applicable legislation that is complying with the PEFC requirement (4.2.2.2).

The standard requires compliance with anticorruption legislation (4.2.2.2). Portugal has an effective anticorruption legislation in place.

The Standard requires measures against unauthorised and illegal activities of third parties (4.2.2.3).

The standard requires the practices and operations to respect human rights as defined by the Universal Declaration on Human Rights. (4.2.3.2).

The Standard has a specific requirement for compliance with the ILO fundamental conventions (4.2.4). In addition, Portugal has ratified all eight fundamental ILO conventions and it can be assumed that those have been implemented through the national legislation and the compliance with it is also required by the standard (4.2.2.2).

Requirements for indigenous peoples are not applicable as there are no indigenous people as defined by the UN Declaration and ILO 169 in Portugal.

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

The standard requires identification of the health and safety risks and preventions of those risks by appropriate measures (4.2.5.1). The workers shall be informed and trained against the risks (4.2.5.2).

The standard requires to adopt safety measures to ensure safe working conditions. In addition, it requires compliance with national regulations and collective agreements concerning working hours and other working conditions (4.2.5.2).

The Standard includes a requirement for equal opportunities and non-discrimination and promotion of gender balance (4.2.5.4).

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 (5.5).

The Standard requires forest owners/managers, subcontractors, and employees to be provided with information and training regarding the sustainable forest management (7.2). In addition, all persons shall be aware of the organisation's policy, SFM requirements and implications of non-conformities (7.3).

The Standard requires effective communication and consultation with local communities and other stakeholders (7.4.1). It also defines basic principles of internal and external communication (7.4.2), communication towards the certification body and PEFC (7.4.3) and publicly available information (7.4.4).

The Standard includes provisions for handling complaints and disputes (7.4.5).

The Standard requires the organisation to manage documented information in relation to the size and complexity of the organisation (7.5.1) and management of the documented information (7.5.2.2, 7.5.3).

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

The standard requires to maintain or increase forested area, their ecosystem services, economic, social and environmental values (8.1.1), quality and quantity of forest resources by balancing harvesting and growth rates and appropriate silviculture measures (8.1.2).

The standard includes requirements for climate positive practices, including efficient use of resources and reduction of greenhouse gas emissions (8.1.3).

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

The standard prohibits conversion of forest to non-forest use and to forest plantations with criteria for justified circumstances that cover (i) compliance with legislation; (ii) 5 % maximum threshold; (iii) absence of negative impacts on “ecologically important forest areas, (iv) culturally and socially significant areas, or other protected areas; (v) protection of “high carbon stock”; and (vi) long-term conservation, economic, and social benefits (8.1.4).

The definition of the term “forest plantations” is broader (stricter) than the PEFC definition as it not only refers to “stands of introduced species” but includes all stands established by planting or seeding with a limited number of species, intensive management, regular spacing or even-aged forests

A minor non-conformity has been assigned based on the fact that the definition of “forest conversion” is not clear, is confusing and does not provide evidence that it also covers conversion of forests to forest plantations;

The criteria for justified circumstances of forest conversion include a scale of the conversion referring to 5 % limit (8.1.4b). However, it is not clear or evident to which time period this limitation applies.

The standard includes specific requirement for conversion of degraded ecosystems to forest plantations with the conditions that are satisfying the PEFC requirements.

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

The standard prohibits afforestation of ecologically important non-forest areas, unless it meets the justified circumstances (8.1.6) that are identical with the PEFC requirements.

A minor non-conformity has been assigned based on vague requirements limiting the scale of the “justified exemptions”.

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

The standard includes requirements relating to the forest health and vitality and rehabilitation of degraded ecosystems (8.2.1).

The standard includes requirements for usage of site suited species in reforestation and afforestation and minimisation of damages to trees and to the forest cover (8.2.4).

The standard requires genetic, species and structural diversity (8.2.2).

The standard includes requirements restricting the use of fires in forest management (8.2.3).

Waste management (PEFC ST 1003:2018, 8.2.5)

The standard includes requirements for disposal of waste and for avoidance of spillage of oil or fuel (8.2.5, 8.2.6).

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 integrated pest management and minimisation of the pesticides usage (8.2.7), requirements for records on the pesticides usage (8.2.8); and proper equipment for the pesticides usage following formal instructions (8.2.11.)

The Standard prohibits the use of chlorinated hydrocarbons and those banned by international agreement (8.2.10).

Prohibits WHO 1A and 1B pesticides and other highly toxic pesticides. No exemption is allowed for WHO 1A and 1B pesticides (8.2.9).

The Standard requires controlled use of fertilisers and prohibits the fertilisers to be used as an alternative to soil nutrient management (8.2.12).

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 forests for both wood and non-wood products (8.3.1).

The standard includes requirements for sound economic performance, consideration of new markets and economic activities (8.3.2).

The standard includes requirements that forest operation shall not reduce the productive capacity and shall not damage soil, water and remaining vegetation (8.3.3).

Sustainable production (PEFC ST 1003:2018, 8.3.4)

The standard requires a long-term sustainability of wood and non-wood forest products harvesting (8.3.4).

Forest infrastructure (PEFC ST 1003:2018, 8.3.5)

The standard includes requirements for building forest infrastructure with minimisation of impacts on the environment (8.3.5), biodiversity (8.4.6) and water and soil (8.5.5).

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

The standard includes requirements for conservation, maintenance and enhancement of biodiversity at on landscape, ecosystem, species and genetic levels (8.4.1).

The standard includes requirements promoting horizontal and vertical diversity of forest stands and maintenance or restoration of landscape diversity (8.4.8).

The standard requires support to traditional management practices (8.4.9).

The standard requires forest management operations that do not cause lasting damages to ecosystems (8.4.10).

The standard includes requirements for control of damages caused by animal population (8.4.12).

Ecologically important forest ecosystems (PEFC ST 1003:2018, 8.4.2)

The standard requires to identify and protect ecologically important forest areas (8.4.2). The definition of this term (3.1.7) is compatible with the PEFC Council's definition of the ecologically important forest areas (PEFC ST 1003:2018, 3.5).

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

The standard exploitation of threatened and protected species for commercial purposes (8.4.3).

The standard includes requirements for successful regeneration, being either natural regeneration or planting (8.4.4).

The standard includes requirements for the usage of native species and restrictions concerning the use of introduced specie, including evaluation of their impacts (8.4.5).

The standard requires that planting activities shall contribute to the improvement of ecological connectivity. (8.4.6).

The standard requires prohibition of the GMO material (8.4.7).

Dead wood (PEFC ST 1003:2018, 8.4.13)

The standard includes requirements for dead wood and other biodiversity features (8.4.13). The requirement also refers to the risks of wildfires that shall be taken into consideration when implementing the requirement.

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

The standard includes requirements for protection of sites with protective functions for society (8.5.1), including requirements for identification and mapping of those forests (8.5.2).

The standard includes requirements for protection of soil against erosion on sensitive soils, usage of machinery and control of animal populations (8.5.3).

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

The standard includes requirements for protection of quality and quantity of water resources (8.5.4).

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

The standard includes requirements to respect socio-economic functions of forests (8.6.1).

The standard ensures public access to forests and defines cases where the public access can be restricted (8.6.2).

The standard requires protection of sites with historical, spiritual and cultural significance (8.6.3). and includes requirements supporting local communities (8.6.4) and their engagement. The requirements do not include reference to indigenous people as those are not present in Portugal.

The standard requires the best use shall be made of forest-related experience and traditional knowledge, innovations and practices such as those of forest owners, NGOs and local communities, including sharing of benefits from the knowledge utilisation (8.6.5).

The standard requires to support local economy, training and employment of local people (8.6.6).

Research (PEFC ST 1003:2018, 8.6.7)

The standard includes requirements promoting research activities and data collection (8.6.7).

Monitoring (PEFC ST 1003:2018, 9.1)

The standard includes requirement for monitoring of forest resources and review as an integral part of the planning process (9.1.1).

The standard includes requirement for monitoring of health and vitality of forest resources (9.1.4), non-wood forest products (9.1.3) and the working conditions (9.1.6).

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

The standard includes requirements for internal audits (9.2), management review (9.3) and improvement (10) that are identical to the PEFC requirements.

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 minor non-conformities.

PEFC requirement	PEFC ST 1003:2018, 4.1 c: The Standard shall apply to all operators in the defined forest area
No.	7
Type	Minor non-conformity
Description	<p>The standard explicitly states that “the management system shall be “suitable” for agents with activities in the defined forest area”. However, this wording does not ensure the objective of the PEFC requirement 4.1c that all operators in the defined forest area shall comply with the Standard.</p> <p>PEFC Portugal argues^[54] that the wording “shall be suitable to” is equivalent to “shall apply to”.</p> <p>However, the meaning of the word “suitable” is “acceptable” or “right to someone or something” and synonyms to this word would be “appropriate to” or “fitting to”.</p> <p>In contrary, the wording “apply” (referenced by PEFC ST 1003:2018) refers to “to relate to” or “to make use of something”.</p> <p>Within the context of PEFC ST 1003, the wording “the management system shall be suitable to all agents” is not satisfying the PEFC requirement “shall apply to all agents”.</p>

PEFC requirement	PEFC ST 1003:2018, 8.1.4: Forest conversion
No.	8
Type	Minor non-conformity
Description	<p>The standard in principle prohibits forest conversion and defines criteria for “justified” forest conversion.</p> <p>The minor non-conformity has been assigned based on the following argumentations:</p> <ol style="list-style-type: none"> the definition of “forest conversion” is not clear, is confusing and does not provide evidence that it also covers conversion of forests to forest plantations; The criteria for justified circumstances of forest conversion include a scale of the conversion referring to 5 % limit (8.1.4b). However, it is not clear or evident to which time period this limitation applies. Is it 5 % for an individual conversion project, or 5 % over the validity of forest management plan, or 5 % since the adoption of this standard or 5 % since the first PEFC certification?

Concerning the definition of “forest conversion”, PEFC Portugal argues^[54] that this is a mistake in the Portuguese version of NP 4406 and that a process of introducing an amendment to the NP 4406 standard has been launched and that the definition 3.1.18 should read as follows: “forest conversion: Alteration, by direct human action, of land use from forested areas to other types of land use”. It should be noted that even this amendment would not satisfy the PEFC requirement as the term forest conversion shall cover both (i) change of forest area to other land use as well as (ii) change of forest area to forest plantations.

Concerning the 5 % limit, PEFC Portugal argues^[54] that the issue has been widely discussed in WG1 of TC 145. PEFC Portugal claims that it requested clarification from the PEFC Council and that a response from the PEFC Council stated that “it is up to the group to decide”.

The assessor has no full access to the PODIO communication between the PEFC Council and its members and as such cannot take this into consideration, especially without access to a full wording of the response A3 presented in Podio.

Regardless of the communication between the PEFC Council and PEFC Portugal, the 5 % surface limit without the time period is considered as ambiguous, is not auditable and does not support the overall objective of the PEFC requirement 8.1.4.

Observation (that do not represent non-conformity with the PEFC requirements)**Observation – detail of the NP4406 requirements**

The requirements of NP 4406 (core part of the document) are for its large part either using identical text with PEFC ST 1003 or a modified text but of the same level of detail. Additional provisions have been added to Annex A concerning assessment indicators (normative) and Annex D with information sources (informative).

Although the national requirements of NP 4406 literally meet the PEFC requirements, the spirit of PEFC ST 1003 document can be questioned. PEFC ST 1003 has been developed as an international benchmark (minimum requirements) rather than certification standard. This was based on a common understanding that it is very difficult if not impossible to develop an international certification standard that would be applicable and suitable to different forest conditions, socio-economic and legal frameworks in different parts of the world.

Observation - traditional management practices (8.4.9), support to research (8.6.7)

The wording “where appropriate” and “as appropriate” is vague and ambiguous and decreases a level of clarity in the implementation and auditing process.

Observation – afforestation of ecologically important non-forest areas (8.1.5) – “small proportion”

The standard prohibits afforestation of ecologically important non-forest areas, unless it meets the justified circumstances (8.1.5) that includes provision for small proportion of the ecosystem. The term “small proportion” represents a challenge in implementation and auditing against the standard. The issue has been classified as “observation” rather than “minor non-conformity” because of the fact that in forest management certification “non-forest areas” will most likely be outside the scope of certification and the requirement would only apply to small areas that are included in the forest management unit (e.g. wetlands, small openings, etc.).

8.5 Requirements for “Trees outside Forests” (ToF)

8.5.1 Introduction and summary

Structure of the Standard

The requirements for the ToF management are defined in the NP 4406 (the forest management standard) in the core part of the document that is common for both the SFM and ToF certification, with an Annex C that defines “additional requirements applicable to Trees outside Forests (TOF)”. Those provides interpretation of specific requirements of the core part for the purposes of the ToF certification.

NP 4406 is using the same approach as applied by PEFC ST 1003:2018 that is based on the following principles:

- a) Requirements in NP 4406, core part, are also applicable to the ToF certification,
- b) Any modifications, alterations, interpretations or additional requirements are defined in Annex C of NP 4406.

Similarly, to PEFC ST 1003:2018, NP 4406 (Annex C) also provides a statement that “all requirements relating to the forest are also applicable to ToF.

Annex C then defines for individual requirements of the core part (Sections 4 – 10) whether:

- Wording of the core part (Section 4 – 10) applies without any modification or
- Provides interpretation for specific requirements of Section 4 – 10.

Definition of the ToF

The scope of the ToF requirements and certification is defined by two terms, “*forest*” and “*Trees outside Forests*” of NP 4406. Those definitions make “forest” and “Trees outside Forests” exclusive terms that do not overlap.

3.1.8 trees outside forests (TOF)

Trees in areas **not classified as forest** (3.1.27) or **forest area** (3.1.24)

a) TOF in urban area

i) isolated trees or in linear structures (alleys, shelter curtains, riparian galleries, green corridors); or

ii) trees in gardens, parks and other green infrastructures.

b) TOF in agricultural area

i) trees in linear structures (alleys, shelter curtains, riparian galleries) < 20m wide and 25m long; or

ii) woodlands with less than 0.5ha and tree cover higher than 5% only with tree layer; or

iii) woodlands with less than 0.5ha and tree cover higher than 10% with tree and shrub layer; or

iv) scatter trees (tree cover less than < 10%)

3.1.27 forest

Land spanning more than 0.5ha, with canopy cover of more than 10% (defined as the ratio between the area of the crowns' horizontal projection and the total area of the plot), where there is the presence of forest trees that due to its characteristics or management system, it has reached, or will reach, arboreal size (higher than 5 m), regardless of the stage at the time of observation. It includes young natural stands and all plantations established with forestry objectives that have not yet reached a crown density of 10% or a tree height of 5 m. It also includes areas integrated in the forest area that are temporarily deforested as a result of human intervention or natural causes, but for which the reconstitution of forest cover is expected (egg areas recently subjected to final cutting or covered by fire). It also includes clearings and forest infrastructure. Excludes predominantly agricultural land and forest areas with urban land use

3.1.24 forest area

Land occupied with forest (3.1.28), scrub and pasture or other spontaneous plant formations.

The standard does not differentiate between the “extensive” and “intensive” type of ToF.

Exclusion of requirements for ToF

NP 4406 (Annex C) does not use an option of excluding some of the SFM requirements for “extensive” ToF (PEFC ST 1003:2018, Appendix 2/D).

8.5.2 Assessment of the ToF Requirements

The ToF standard (NP 4406, including Annex C) has been assessed against the PEFC Council requirements that are defined in PEFC ST 1003:2018, including Appendix 2.

The report includes the following parts relating to the assessment of the ToF requirements' compliance with PEFC ST 1003:2018 (including Appendix 2):

- a) Summary description of the Standards' compliance with PEFC ST 1003:2018 is described in chapter 8.5.2.1;
- b) Assessment results is included in chapter 8.5.2.2;
- c) Detailed assessment of individual PEFC requirements, including assessment conclusion and justifications are included in Annex D to this report.

8.5.2.1 Description of the ToF standards' compliance with PEFC ST 1003:2018

Summary of modifications/interpretations for ToF certification (PCSN I, Appendix 2)

The following table provides a summary of requirements that have modified / interpreted in Annex C of NP 4406.

Modified or new requirements		
Requirement (NP 4406)	Topic	Summary of modification / interpretation
7.4.5, 8.1.2, 8.2.1, 8.2.2, 8.2.4, 8.3.1, 8.3.2, 8.4.2, 8.5.1, 8.6.2, 8.6.5	Reference to ToF	Reference to ToF and agriculture environment rather than "forests".
4.2.2.2	Applicable legislation	In addition to legislation defined in 4.2.2.2, also legislation applicable to ToF management, agriculture and agroforestry shall be complied with.
6.3	Management plan	In addition to 6.3 requirements, management plan shall also include the forestry and arboriculture guidelines and recommended models in the legislation or other regulations applicable at the local scale (ToF).
6.3.3.	Good agriculture practices	ToF systems agricultural components management shall regard good agricultural practices and the available guidelines.
7.2	Competence	Specific competence regarding forestry and arboriculture in rural an urban areas
7.4.3	Reporting on certified area	The certified area shall report to the CB and PEFC ToF certified area.
8.1.1, 8.4.1	Biological diversity	Maintenance or enhancement of biological diversity at the landscape level.
8.1.4	Conversion to ToF	Defines the requirements for forest conversion to ToF, including the date of 31 December 2010 after which the

		requirements apply, concerning the ToF eligibility for conversion.
8.1.5	Conversion of ecologically important non-forest areas to ToF	Defines the requirements for ecologically important non-forest areas to ToF.

8.5.2.2 Results of the assessment and non-conformities

The assessment identified the following minor non-conformities with the PEFC requirements (PEFC ST 1003:2018, including Appendix 2).

All non-conformities identified for the SFM standard (see chapter 8.4.2.2) also apply for the ToF standard with the following additional non-conformities.

PEFC requirement	8.1.5 Conversion of ecologically important non-forest ecosystems
No.	9
Type	Minor non-conformity
Description	<p>The standard prohibits afforestation of ecologically important non-forest ecosystems and their conversion to ToF (C.8.1.5).</p> <p>The minor non-conformity has been assigned based on two elements:</p> <ul style="list-style-type: none"> a) The standard does not require that ToF areas established by a conversion of ecologically important non-forest ecosystems after 31.12.2010 are not eligible for PEFC certification. The NOTE to C.8.1.4 applies to conversion from forests to ToF rather than from the ecologically important non-forest ecosystems. <p>PEFC Portugal has provided response to this non-conformity that the omission of the date under the requirement 8.1.5 (respectively C8.1.5) was a mistake that will be corrected following the IPQ processes for introduction of amendments.</p>

PEFC requirement	Definition of the term “Ecologically important non-forest area”
	(Assessment and Endorsement of national Trees outside Forests standards - Approved by the PEFC Board on 8th March 2023)
No.	10
Type	Minor non-conformity
Description	The NP 4406 standard does not include the required definition of “ecologically important non-forest area”.

	<p>It should be noted that the PEFC requirement established by the PEFC Council Board of Directors on 8 March 2023 only came into force after the NP 4406 standard formal approval and after the commencement of the endorsement evaluation, at the stage of preparing the final draft report. It was neither known to PEFC Portugal at the stage of the standard development nor at the stage of submission of application for the PEFC endorsement. PEFC Portugal also did not have chance to respond to this minor non-conformity.</p> <p>It should also be noted that the “new” PEFC Council Board requirement for the “ecologically important non-forest area” does not have any relevance to PEFC ST 1003:2018, as it is neither used in the core part of PEFC ST 1003:2018 nor in its Appendix 2 relating to the ToF.</p> <p>When considering this minor non-conformity and making the PEFC endorsement decision, the PEFC Council should take into account those facts as well as the retrospective nature of the “new” PEFC requirement.</p>
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PEFC requirement	Identification of ToF certified area (Assessment and Endorsement of national Trees outside Forests standards - Approved by the PEFC Board on 8th March 2023)
No.	11
Type	Minor non-conformity
Description	<p>The PEFC Council BoD paper on “Assessment and Endorsement of national Trees outside Forests standards” (see chapter 6) requires that the national system shall:</p> <ul style="list-style-type: none"> a) Develop a mechanism to monitor the ToF areas (certified), b) Include certified ToF areas under the term “certified area”, c) Collect the certified area for each ToF categories separately, d) Ensure that ToF and non-ToF areas are clearly identified within certification. <p>The Portuguese scheme requires that:</p> <ul style="list-style-type: none"> a) The certified organisation shall provide the CB and PEFC with updated information on the ToF certified area (NP 4406, C.7.4.3); b) The ToF certified areas is a part of the term “certified area” (NP 4406, 3.1.6), c) Certification process (PEFC PT 1005) distinguishes between forest and ToF management system and requires “ToF areas” and “forest areas” to be submitted by the applicant as a part of application for certification. The “ToF management system” is also referenced in evaluation and reporting requirements of PEFC PT 1005. <p>However, the minor non-conformity is based on the following arguments:</p>

a) The Portuguese scheme does not require monitoring and collection of data on the certified areas of individual categories of ToF (ToF in urban area / ToF in agriculture area);

b) It is not evident that the “scope of certification” as described by the certification document is required to reference “ToF certification” (PEFC PT 1002. Ch. 5). Also, the certification report is only required to reference “forest area” (PEFC PT 1005, 9.4.8).

It should be noted that the PEFC requirement established by the PEFC Council Board of Directors on 8 March 2023 only came into force after the NP 4406 standard formal approval and after the commencement of the endorsement evaluation, at the stage of preparing the final draft report. It was neither known to PEFC Portugal at the stage of the standard development nor at the stage of submission of application for the PEFC endorsement. PEFC Portugal also did not have chance to respond to this minor non-conformity.

When considering this minor non-conformity and making the PEFC endorsement decision, the PEFC Council should take into account those facts as well as the retrospective nature of the “new” PEFC requirement.

8.6 Requirements for “Forest Plantations”

8.6.1 Introduction and summary

Structure of the Standard

The NP 4406 standard is also applicable to “forest plantations” as “forest plantations” are covered by the term “forest”.

Where specific requirements or interpretations apply to “forest plantations”, it is included in the core part of the standard under a specific requirement. This approach is compatible with PEFC ST 1003:2018. Instead of having the interpretation under a separate Annex (as in PEFC ST 1003:2018), the interpretation is directly placed under the specific requirement.

Example of the structure of the NP 4406 standard

8.2.1 Health and vitality of forest ecosystems shall be maintained or enhanced. Degraded forest ecosystems shall be rehabilitated wherever and as far as economically feasible, by making best use of natural structures and processes and using preventive biological measures.

Plantations Guidelines:

Where it is not possible to verify this requirement at the individual stand level, it should be considered on a larger scale within the certified area, where stands are complemented with buffer zones and set-aside areas with environmental, ecological, cultural and social functions.

With the aim of improving landscape and biodiversity values, water and soil protection, the size and distribution of buffer zones and set-aside areas intended for conservation should be identified at the forest plantation planning stage, based on social, environmental and ecological assessments, as well as reassessed in the (re)afforestation stages.

8.6.2 Assessment of the Forest Plantations requirements

8.6.2.1 Description of the forest plantations requirements’ compliance with PEFC ST 1003:2018

Summary of modifications/interpretations for Forest Plantations certification

NP 4406 provides interpretations for the same requirements as included in Appendix 1 of PEFC ST 1003:2018. The interpretations are identical to those included in Appendix 1 to PEFC ST 1003:2018.

Interpretations for forest plantations		
Requirement (NP 4406)	Topic	Summary of modification / interpretation
8.1.1, 8.2.1, 8.2.2, 8.4.1, 8.6.1	Evaluation of the requirements on larger area	Where it is not possible to verify this requirement at the individual stand level, it should be considered on a larger scale within the certified area, where stands are complemented with buffer zones and set-aside areas with environmental, ecological, cultural and social functions. With the aim of improving landscape and biodiversity values, water and soil protection, the size and distribution of buffer zones and set-aside areas intended for conservation should be identified at the forest plantation planning stage, based on social,

		environmental and ecological assessments, as well as reassessed in the (re)afforestation stages.
8.1.4	"Conversion date"	Forest plantations resulting from a conversion after December 31, 2010 without "justified circumstances" are not eligible for certification.
8.4.2, 8.4.8, 8.4.9, 8.4.13	Biological diversity	The requirements to be addressed primarily in the implementation phase and be applied in buffer zones and set-aside areas dedicated to environmental, ecological, cultural and social functions.
8.4.5	Introduced species	ToF systems agricultural components management shall regard good agricultural practices and the available guidelines.

8.6.2.2 Results of the assessment and non-conformities

The assessment identified the following minor non-conformities with the PEFC requirements (PEFC ST 1003:2018, including Appendix 1).

All non-conformities identified for the SFM standard (see chapter 8.4.2.2) also apply for the forest plantations with the following additional non-conformity.

PEFC requirement	PEFC ST 1003:2018/A1, 8.1.5: Eligibility of plantations converted from ecologically important non-forest ecosystems
No.	12
Type	Minor non-conformity
Description	<p>The standard does not have applicable requirement that would state that forest plantations established by conversion of ecologically important forest ecosystems after 31 December 2010 are not eligible for forest certification.</p> <p>PEFC Portugal has provided response to this non-conformity that the omission of the date under the requirement 8.1.5 was a mistake that will be corrected following the IPQ processes for introduction of amendments.</p>

8.7 Chain of custody requirements

The applicant has not submitted for the assessment and the 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 2002:2020 that was adopted by the PEFC Portugal as a part of the scheme.

Therefore, the assessment of the chain of custody requirements is only focused on whether or not the applicant formally adopted PEFC ST 2002:2020 as a part of its scheme and PEFC ST 2002:2020 is mandatorily required to be used for the purposes of chain of custody certification.

- PEFC Portugal adopted PEFC ST 2002 as a part of its scheme through reference in PEFC PT 1001, chapter 6:

“CFFP/PEFC Portugal has fully adopted and subscribes to all provisions of the PEFC ST 2002 Chain of Custody of Forest and Tree Based Products – Requirements, as the basis for Chain of Custody systems certification in the scope of the SPCF”.

- PEFC ST 2002 is also referenced in PEFC PT 1002 (accreditation and notification).

PEFC ST 2002 is listed under the “normative references” of PEFC PT 1001 and PEFC PT 1002 as “undated” references and as such the latest version of the referenced documents apply (i.e. PEFC ST 2002:2020). This is a common practice within the ISO documentation and referencing of normative documentation.

Conclusion

The applicant adopted the PEFC international standard for chain of custody (PEFC ST 2002:2020) directly by approving the standard as a part of the scheme.

8.8 Requirements for certification bodies

8.8.1 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 8.6).

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.

Therefore, the assessment is focused on:

- a) Formal adoption of PEFC ST 2003:2020 by the applicant as a part of the scheme and a sole document with requirements for chain of custody certification bodies;
- b) Whether or not the applicant developed scheme specific requirements for chain of custody certification bodies.

Formal adoption of PEFC ST 2003:2020

- PEFC Portugal adopted PEFC ST 2003 as a part of its scheme through reference in PEFC PT 1001, chapter 7:

"CBs that purpose to act within the scope of SPCF for Chain of Custody certification shall be in compliance with the PEFC Council's requirements for accreditation of chain of custody certification bodies defined in PEFC ST 2003".

"The fulfilment of the requirements described in PEFC ST 2003 and/or PEFC PT 1005 and related documentation are verified during the accreditation process of certifying bodies. Decisions on certification taken without consideration of the terms of accreditation will be considered invalid".

Scheme specific requirements for CoC certification bodies

The scheme does not define scheme specific requirements for chain of custody certification bodies.

8.8.2 Requirements for forest management certification bodies

8.8.2.1 Introduction and summary

Coverage and scope of requirements

The requirements for certification bodies for forest management certification are described in PEFC PT 1002 and PEFC PT 1005.

Structure of the document (PEFC PT 1005)

The document is logically structured following the structure of ISO/IEC 17021-1 and includes:

1. Introduction;
2. Normative references;
3. Terms and definitions;
4. Principles;
5. General requirements;
6. Structural requirements;
7. Resource requirements;
8. Information requirements;
9. Process requirements;

In addition, it also includes an Annex for audit sampling.

Certification and accreditation framework

PEFC PT 1005 is based on and makes mandatory reference to ISO/IEC 17021 and as such considers the forest management certification as the “management system certification”.

PEFC PT 1002 requires certification bodies to be accredited and to conduct the certification as “accredited certification”. The accreditation shall be issued by an accreditation body that is a member of IAF or EA.

Competencies of the certification body and auditors

PEFC PT 1005 requires that the certification body shall have competencies in forest management and the PEFC forest certification scheme. This is delivered through comprehensive requirements for auditors, including their education, working experience, audit experience training, competences and knowledge and monitoring of auditor performance.

PEFC PT 1005 defines specific competencies relating to forest sector, ToF, legislation, nature protection, technical aspects of forestry operations, etc.

Those requirements are meeting and significantly exceeding the PEFC requirements.

Stakeholders' consultation

PEFC PT 1005 requires stakeholders' consultation to be included in the certification process together with collection and analysis of data from external sources.

Public availability of the certification report summary

PEFC PT 1005 requires that the certification body prepares certification report that is made publicly available by the certified client.

Notification of certification bodies

PEFC PT 1002 requires that the certification bodies for forest management certification shall be notified by PEFC Portugal.

8.8.2.2 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 the following minor non-conformities.

PEFC requirement	Annex 6, 11: Transfer of information to PEFC Portugal
No.	13
Type	Minor non-conformity
Description	<p>PEFC PT 1002 requires that the certification body shall agree to follow administrative conditions specified by the PEFC notification and provide PEFC Portugal with data relating to issued certificates.</p> <p>However, PEFC Portugal has not presented the "administrative conditions" referenced in PEFC PT 1002, ch.2 and has not provided evidence that all issued certificates and changes to their scope and validity is communicated to PEFC Portugal.</p> <p>PEFC Portugal provided as a response to a draft interim report a Notification Contract with the certification bodies. However, the submitted contract is only applicable to chain of custody certification based on PEFC ST 2002 and does not apply to forest management certification.</p>

PEFC requirement	Annex 6, 15: Public availability of the certification report summary
No.	14
Type	Minor non-conformity
Description	<p>PEFC PT 1005 requires public availability of certification report summary. However, the document does not specify the timescale and as such does not satisfy the PEFC Council interpretation⁶ of this requirement published on Podio.</p> <p>PEFC Portugal provided a response to this non-conformity^[54] arguing that it has no access to the interpretation published by the PEFC Council at the Podio. It should be noted that the assessor has no access to communication between the PEFC Council and its members and their access to information published at the Podio. The assessor has neither responsibility to ensure proper communication between the PEFC Council and its members.</p>

⁶ The "applicable requirements defined by a certification scheme" shall cover, amongst others, "that the summary shall be made available to any interested party on request within a defined timescale". (<https://podio.com/pefc-international/pefc-standards-interpretations-and-clarifications/apps/standards-interpretations-and-clarification/items/2>)

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>Status CFFP (CFFP DOC 1001:2019)</p> <p>CFFP (Portuguese Forestry Sector Council) is a non-for-profit membership based organisation promoting sustainable forest management and its verification. The CFFP is a member of the PEFC Council and a governing body of the Portuguese PEFC scheme.</p> <p>OR TC 145</p> <p>Ch 1: "Within the framework of the Portuguese Quality System, the Instituto Português da Qualidade (IPQ), as the National Standards Body, coordinates the national standardization activity defined in the "Regulations and Procedures for Portuguese Standardization" [RPNP]. These RPNP comprise, among others, the following documents:....".</p> <p>Definitions: SSB</p> <p>"SSB – Sectoral Standardisation Body: Public, private or mixed body, recognized by the NSB to carry out standardization activities in a given domain, within the scope of the Portuguese Quality System, namely the coordination of Technical Committees for Standardization (TCs). The NSB that coordinates this Technical Commission is the Instituto da Conservação da Natureza e das Florestas (ICNF, I.P.)."</p> <p>Ch. 3: "TC 145 is a technical body that aims to draw up standard documents and informative documents, in the field of forest management, in which individual or collective stakeholders with an interest in the matters in question participate on a voluntarily basis, representing, as far as possible, a balanced composition of the socio-economic and environmental interests covered.</p> <p>CH. 6.4: "For the Portuguese Standard, after having ensured that all applicable procedures have been complied with, the NSB approves, ratifies and edits the documents that become part of the Portuguese normative collection, through their official publication within the deadlines established for that purpose".</p> <p>Compliance: Conformity</p> <p>Justification: OR TC 145 defines the operating procedures of the Technical Committee 145 and also makes reference to other procedures of the IPQ, the National Standards Body in Portugal (NSB).</p> <p>Within the procedures it is evident the IPQ is the body responsible for formal approval of the NP 4406 standard.</p> <p>TC 145 is the multistakeholder body responsible for the development/revision of the NP4406 standard and consensus</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			building. The work of TC 145 is coordinated and secretariat provided by SSB (
(b) procedures for keeping documented information,	Procedures	YES	<p>OR TC 145</p> <p>5.3: "The Secretariat of TC 145...being responsible for:</p> <ul style="list-style-type: none"> - Ensure that the documents necessary for the operation of TC 145 are guaranteed, as well as all logistical support; - To act as a secretary during plenary meetings and draw up its minutes which must:... - Prepare, in collaboration with the Chairman, and send to the SSB, the annual activity report of TC 145, as well as the work plan for the following year or multi-annual, if applicable, and the standardization plan in accordance with the models established by the NSB". <p>Compliance: Conformity</p> <p>Justification: The document includes procedures for keeping documented information.</p>
(c) procedures for balanced representation of stakeholders,	Procedures	YES	<p>OR TC 145</p> <p>OR TC 145, ch.3 and 4 defines procedures for the composition of TC 145, including detailed description of three stakeholder's chambers (environmental, economic, and social).</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>OR TC 145</p> <p>Ch. 6 rules for the elaboration, approval and review of standardization documents</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>OR TC 145</p> <p>Ch. 6.3 defines rules for reaching consensus and approval of a standard by TC 145.</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>Ch. 1 make s reference to two NSB's documents governing the review and revision process:</p> <ul style="list-style-type: none"> - RPNP-040/2020, Portuguese standardization documents – Typology, homologation, approval, review and annulment;

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>- RPNP-041/2010, Portuguese standardization documents – General rules for their presentation;</p> <p>Ch. 8 defines periodic evaluation and review of the standard.</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>OR TC 145</p> <p>Ch 1: "These Rules are periodically reviewed by TC 145 or whenever justified, namely as a result of changes to the NSB rules, proposals from its members or comments from other interested parties that are not part of TC 145, as a result of national dissemination actions, or that derive from the change in the composition of TC 145. All contributions shall be discussed by TC 145, and once approved by its members, they are sent to the SSB, for an opinion and validation by the NSB. These Rules are publicly available and can be consulted on the SSB website, without prejudice to the possibility of using other means of dissemination, with the appropriate citation of the source".</p> <p>Compliance: Conformity</p> <p>Justification: OR TC 145 states that the document is publicly available.</p> <p>OR TC 145 requires the document shall be periodically reviewed, including consideration of comments from stakeholders.</p>
	Process	YES	<p>Public availability of the standard setting procedures: OR TC 145 has been published by ICNF http://www2.icnf.pt/portal/florestas/gf/norm-gf/norma-gf as well as CFFP at its website: https://pefc.pt/normalizacao/revisoes-normativas-a-np-4406/5-revisao-normativa-np-4406.</p> <p>Review of OR TC 145</p> <p>TC 145 reviewed OR TC 145 before the TC 145 meeting held on 4 April 2019^[1]. Stakeholders discussed the document at the TC 145 meeting and it was also agreed that the document will be sent for comments to stakeholders as a part of an invitation for participation in TC 145.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>OR TC 145 is available at the PEFC Portugal (CFFP) website as well as at the website of ICNF.</p> <p>OR TC 145 has been reviewed and revised, including consideration of stakeholders' comments.</p>
5.2.1 The standardising body shall keep documented information relevant to the standard-setting and review process. Evidence of compliance with the requirements of this standard and the standardising body's own procedures includes:			
(a) Standard-setting procedures,	Procedures	YES	OR TC 145

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			TC 145 operates based on written standard setting procedures, OR TC 145. Compliance: Conformity Justification: The scheme keeps standard setting procedures.
	Process	YES	TC 145 operates based on written standard setting procedures, OR TC 145 that is available at the CFFP as well as ICNF websites. Compliance: Conformity Justification: The scheme keeps standard setting procedures and makes it publicly available through its website.
(b) Stakeholder identification mapping,	Procedures	YES	OR TC 145 The procedures do not require to keep documented information (records) on the stakeholders mapping. PEFC PT GUIDE 1005 7.4: "In each NP4406 revision process, the procedures adopted must follow the rules of the normalization system, namely the procedures adopted by TC 145. Additionally, PEFC Portugal should make efforts to: a) gather the necessary records for its process of maintaining recognition, namely: - stakeholders mapping; - contacted / invited stakeholders; - all drafts and final version of the standard; - final approval of the standard. b) All records must be kept for at least 5 years or until the next review. c) provide the necessary information to stakeholders, so that they have the knowledge and documentation necessary for the development of ongoing work". Compliance: Conformity Justification: OR TC 145 includes procedures for stakeholders mapping. However, it does not explicitly require to keep documented information (records) relating to the stakeholders mapping. The requirements for the records keeping are included in the PEFC Portugal's own procedures (7.4) that is responsible for the stakeholders mapping.
	Process	YES	The applicant provided a document outlining the stakeholders mapping [2]. Compliance: Conformity Justification: PEFC Portugal / ICNF / IPQ keeps records on stakeholders mapping.

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
(c) Contacted and/or invited stakeholders	Procedures	YES	<p>OR TC 145</p> <p>The procedures do not require to keep documented information (records) on the contacted or invited stakeholders.</p> <p>PEFC PT GUIDE 1005</p> <p>7.4: "In each NP4406 revision process, the procedures adopted must follow the rules of the normalization system, namely the procedures adopted by TC 145. Additionally, PEFC Portugal should make efforts to:</p> <p>a) gather the necessary records for its process of maintaining recognition, namely:</p> <ul style="list-style-type: none"> - stakeholders mapping; - contacted / invited stakeholders; - all drafts and final version of the standard; - final approval of the standard. <p>b) All records must be kept for at least 5 years or until the next review.</p> <p>c) provide the necessary information to stakeholders, so that they have the knowledge and documentation necessary for the development of ongoing work".</p> <p>Compliance: Conformity</p> <p>Justification: OR TC 145 includes procedures for invitation of stakeholders. However, it does not explicitly require to keep documented information (records) relating to invitation of and communication with stakeholders.</p> <p>The requirements for the records keeping are included in the PEFC Portugal's own procedures (7.4) that is responsible for the stakeholders mapping.</p>
	Process	YES	<p>The applicant has submitted records on invitation of stakeholder to the revision process. For more detail, see evaluation of PEFC requirement 6.3 and 6.5.</p> <p>Compliance: Conformity</p> <p>Justification: TC 145 keeps records on stakeholders communication.</p>
(d) Stakeholders involved in standard-setting activities including participants in each working group meeting,	Procedures	YES	<p>OR TC 145</p> <p>5.3: The secretariat...being responsible for:</p> <ul style="list-style-type: none"> - To act as a secretary during plenary meetings and draw up its minutes which must: <ul style="list-style-type: none"> • Detail the comments and opinions presented by members, noting in particular any points that may have been the subject of considerable controversy or on which no consensus could be obtained, as well as any conclusions reached and proposals for changes; • Be sent in advance to the members, 15 days before each meeting for approval on the day of the meeting;

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<ul style="list-style-type: none"> Be archived by the secretariat, to be made available for consultation by members or by other interested party. <p>Compliance: Conformity</p> <p>Justification: OR TC 145 requires the secretariat to keep minutes of the meetings that also include members being present.</p>
	Process	YES	<p>The applicant provided a list of members of the Forum (Annex F) as well as minutes of TC 145 meetings showing participation of the members in the standardisation activities.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The TS 145 secretariat keeps records of the stakeholders participating in the standardization activities.</p>
(e) Feedback received and a synopsis of how feedback was addressed,	Procedures	YES	<p>OR TC 145</p> <p>6.3: "In the case of moving to the NP stage, the NSB, with the collaboration of TC 145, must prepare a document including the description of the standardization process developed, the compilation of all the comments received, the results obtained in the scope of the assessment and it publicly, for example on its website and may also be placed on websites of other associations to which the matter relates".</p> <p>Compliance: Conformity</p> <p>Justification: OR TC 145 requires to keep records on received comments and their consideration.</p>
	Process	YES	<p>The applicant provided the assessor with all received comments and results of their consideration. See also evaluation of PEFC requirement 6.5.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The applicant keeps records on comment received during public consultation and results of their consideration.</p>
(f) All drafts and final versions of the standard,	Procedures	YES	<p>OR TC 145</p> <p>The procedures do not require to keep documented information (records) on all drafts and final version of the standard.</p> <p>PEFC PT GUIDE 1005</p> <p>7.4: "In each NP4406 revision process, the procedures adopted must follow the rules of the normalization system, namely the procedures adopted by TC 145. Additionally, PEFC Portugal should make efforts to:</p> <p>a) gather the necessary records for its process of maintaining recognition, namely:</p> <ul style="list-style-type: none"> - stakeholders mapping; - contacted / invited stakeholders;

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>- all drafts and final version of the standard;</p> <p>- final approval of the standard.</p> <p>b) All records must be kept for at least 5 years or until the next review.</p> <p>c) provide the necessary information to stakeholders, so that they have the knowledge and documentation necessary for the development of ongoing work".</p> <p>Compliance: Conformity</p> <p>Justification: OR TC 145 includes procedures for development of the normative documents. However, it does not explicitly require to keep documented information (records) on all drafts and final version of the standard.</p> <p>The requirement for keeping records on all drafts and final version of the standard is included in the PEFC Portugal own documentation.</p> <p>It should also be noted that the final draft standard shall be sent to the IPQ for formal approval and that the IPQ is keeping records of those documents following its own procedures. This was confirmed during the face-to-face interview with the IPQ.</p> <p>Observation</p> <p>PEFC Portugal has added the requirement for keeping records of all version of the standard to PEFC PT GUIDE 1005 that primarily focuses on stakeholders mapping and keeping of records on all version of the developed standard is outside the primary scope of the document. As the TC 145, respectively ICNF is responsible for the development of the standard as the SSB, this requirement should rather be included in TC 145 Procedures (OR TC 145).</p>
	Process	YES	<p>Compliance: Conformity</p> <p>Justification:</p> <p>As a part of the evaluation, the applicant provided several evidences that confirmed that different versions of the forest management standard have been kept. The versions have been provided to members of TC 145.</p>
(g) Outcomes from working group considerations,	Procedures	YES	<p>OR TC 145</p> <p>5.3: "The secretariat...being responsible for:</p> <p>- To act as a secretary during plenary meetings and draw up its minutes which must:</p> <ul style="list-style-type: none"> Detail the comments and opinions presented by members, noting in particular any points that may have been the subject of considerable controversy or on which no consensus could be obtained, as well as any conclusions reached and proposals for changes; Be sent in advance to the members, 15 days before each meeting for approval on the day of the meeting; Be archived by the secretariat, to be made available for consultation by members or by other interested party".

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			Compliance: Conformity Justification: OR TC 145 requires the secretariat to keep minutes of the meetings that also include outcomes of the TC 145 considerations.
	Process	YES	<p>The applicant kept minutes of TC 145 meetings that include outcomes from the Forum's consideration. See evaluation of PEFC requirement 6.4.4.</p> Compliance: Conformity Justification: The applicant keeps records on the Forum's meetings.
(h) Evidence of consensus on the final version of the standard(s),	Procedures	YES	OR TC 145 5.3: "The secretariat...being responsible for: - To act as a secretary during plenary meetings and draw up its minutes which must: <ul style="list-style-type: none"> Detail the comments and opinions presented by members, noting in particular any points that may have been the subject of considerable controversy or on which no consensus could be obtained, as well as any conclusions reached and proposals for changes; Be sent in advance to the members, 15 days before each meeting for approval on the day of the meeting; Be archived by the secretariat, to be made available for consultation by members or by other interested party". 6.2: "The draft document of a standardization document is approved by TC 145 and is sent to the SSB, with the "report on the approval of normative documents" prepared by the Chairman of TC 145, which describes the process and the results of the vote, with the proposal for submission to public inquiry. The NSB analyzes the documentation for: <ul style="list-style-type: none"> Consider the objections raised in CT 145; Check the consistency of the draft standard with document RPNP – 040 and 041 and with existing standards; Analyze any other technical or formal aspects". 6.3 "In the case of moving to the NP stage, the SSB, with the collaboration of TC 145, must prepare a document including the description of the standardization process developed, the compilation of all the comments received, the results obtained in the scope of the assessment and it publicly, for example on its website and may also be placed on websites of other associations to which the matter relates". Compliance: Conformity Justification: OR TC 145 requires the secretariat to keep minutes of the meetings that also include decisions made by the TC. In addition, the Chairman of TC 145 shall prepare a report on the standardization activities to be submitted to the NSB.

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
	Process	YES	<p>TC 145 made approval of NP 4406 and the decision is recorded in minutes of the TC 145 meetings (see evaluation of PEFC requirement 6.4.5).</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The applicant keeps records on TC 145 decisions.</p>
(i) Evidence relating to the review process, and	Procedures	YES	<p>OR TC 145</p> <p>7.1 “Comments are considered to be all comments received in the various available channels, including meetings, training actions, etc. and must be recorded and considered within the scope of the review processes”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The procedures require to keep records on the permanent mechanism for collecting comments that is a fundamental part of the review process. In addition, PEFC PT GUIDE PT 1005 requires to keep records relating to all standardisation activities.</p>
	Process	YES	<p>Feedback mechanism</p> <p>The applicant indicated that the website of PEFC Portugal . https://www.pefc.pt/normalizacao/comissao-tecnica-para-a-gestao-florestal-sustentavel/como-participar-na-ct-145 and the website of ICNF https://icnf.pt/florestas/normalizacao/gestao includes on-going invitation to stakeholders to submit comments / questions relating to the forest management standard. The comments are considered by TC 145 and records are kept as a part of the minutes.</p> <p>Gap analysis</p> <p>TC 145 considered at its meeting held on 4 April 2019 ^[2] a GAP analysis on the scheme compliance with the the PEFC requirements (PEFC ST 1003:2018, PEFC ST 1002).</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The applicant carried out the Gap analysis and has in place a mechanism for collecting feedback on the existing standard.</p>
(j) Final approval by the standardising body.	Procedures	YES	<p>OR TC 145</p> <p>6.4 “For the Portuguese Standard, after having ensured that all applicable procedures have been complied with, the NSB approves, ratifies and edits the documents that become part of the Portuguese normative collection, through their official publication within the deadlines established for that purpose.”</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>PEFC PT GUIDE 1005</p> <p>7.4: "In each NP4406 revision process, the procedures adopted must follow the rules of the normalization system, namely the procedures adopted by TC 145. Additionally, PEFC Portugal should make efforts to:</p> <p>a) gather the necessary records for its process of maintaining recognition, namely:</p> <ul style="list-style-type: none"> - stakeholders mapping; - contacted / invited stakeholders; - all drafts and final version of the standard; - final approval of the standard. <p>b) All records must be kept for at least 5 years or until the next review.</p> <p>c) provide the necessary information to stakeholders, so that they have the knowledge and documentation necessary for the development of ongoing work".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>NSB is responsible for final approval of NP 4406. However, the procedures do not explicitly require that the SSB or NSB shall keep documented information (records) on the final approval of the standard.</p> <p>This requirement is included in the PEFC Portugal's procedures PEFC PT GUIDE 1005.</p> <p>It should also be noted that the formal approval of the standard is the responsibility of the IPQ (the NSB), the records on the decision making is kept by the IPQ and the evidence (record) of its outcome is displayed directly on the approved standard by presenting the date of approval and the decision making body.</p>
	Process	YES	<p>The applicant in the Development report that the standard was formally approved by IPQ on 10 May 2022 and published on 16 May 2022.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The final approval of the standard has been documented.</p>
5.2.2 Documented information shall be kept until completion of the next review or revision of the standard to which they refer. Otherwise the documented information must be kept for a minimum of five years after	Procedures	YES	<p>OR TC 145</p> <p>The procedures do not require that the documented information shall be kept until the next review of the standard.</p> <p>PEFC PT GUIDE 1005</p> <p>7.4b: "All records must be kept for at least 5 years or until the next review".</p> <p>Compliance: Conformity</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
publication of the standard.			Justification: The procedures (PEFC PT GUIDE 1005) require that the documented information shall be kept for at least five years. It should be noted the all records on the standard setting are kept in the IPQ's "Project Management System" that stores all records permanently.
	Process	YES	The applicant provided screenshot of its computer directory which shows that the records relating to the 2014 revision of the NP 4406 standard ^[4] . Compliance: Conformity Justification: The applicant still retains records from the original development of the NP 4406 standard. The interview of the IPQ personnel also demonstrated functioning of the "Project Management System" with the archiving of all relevant records to the standard setting.
5.2.3 Documented information shall be available to interested parties upon request.	Procedures	YES	PEFC PT GUIDE 1005 7.4: "c) provide the necessary information to stakeholders, so that they have the knowledge and documentation necessary for the development of ongoing work". Compliance: Conformity Justification: The procedures of PEFC Portugal that complements OR TC 145 includes a requirement for availability of documented information to stakeholders.
	Process	YES	The documented information was available to stakeholders. Compliance: TO be confirmed Justification: The evidence provided by the applicant (see chapter 6) does not indicate that ICNF (or the applicant) would refuse any request from a stakeholder for documented information retained. This will also be confirmed during 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,	Procedures	YES	OR TC 145 9.1: "Within 10 working days from reception of the complaint/dispute, the chairman of the TC shall call a meeting to submit the question in dispute to the plenary meeting and notify the claimant of its reception". Compliance: Conformity Justification:

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			The procedures require the Chairman of TC 145 to acknowledge the complainant no later than 10 days of the complaint/dispute receipt.
	Process	YES	<p>The applicant claims that it has received no complaint relating to the standard setting activities.</p> <p>Compliance: To be confirmed</p> <p>Justification:</p> <p>The applicant claim has been verified during the in-country visit and by the stakeholders' consultation survey. No stakeholder indicated that a complaint relating to the standard had been presented.</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>OR TC 145</p> <p>9.1 "It is up to the TC 145 plenary to analyze the complaint/dispute according to the following mechanisms:</p> <ul style="list-style-type: none"> - Discuss and mediate the matter in the TC with the aim of finding consensus; - Discuss and mediate the matter between the entities that presented the objection and entities with a different opinion in order to find consensus <p>If this proves to be impossible, the existence of a conflict is confirmed and the TC must decide to create a Complaints/Dispute Resolution Working Group and elect its members:</p> <ul style="list-style-type: none"> - A coordinator; - One representative from each category of stakeholders, represented in the TC; - Secretariat". <p>9.2: "The working group for the settlement of complaints/disputes should deal impartially with any complaint or dispute submitted by the chairman of the TC".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>OR TC 145, ch. 9.1 states that the complaint is firstly analysed by TC 145 plenary meeting.</p> <p>In case that it cannot be resolved, TC 145 establishes a complaint/dispute working group (ch. 9.2) that shall impartially analyse the complaint and provide TC 145 with recommendation to be ratified by the TC 145 plenary meeting.</p>
	Process	YES	<p>The applicant claims that it has received no complaint relating to the standard setting activities.</p> <p>Compliance: To be confirmed</p> <p>Justification:</p> <p>The applicant claim has been verified during the in-country visit and by the stakeholders' consultation survey. No stakeholder</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			indicated that a complaint relating to the standard had been presented.
(c) formally communicate the decision on the complaint or appeal to the complainant and describe the handling process.	Procedures	YES	<p>OR TC 145</p> <p>9.2: "The Chairman must inform the complainant and the parties in dispute on the decision".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The procedures require to inform the complainant and other parties about the result of the complaint resolution process.</p>
	Process	YES	<p>The applicant claims that it has received no complaint relating to the standard setting activities.</p> <p>Compliance: To be confirmed</p> <p>Justification:</p> <p>The applicant claim has been verified during the in-country visit and by the stakeholders' consultation survey. No stakeholder indicated that a complaint relating to the standard had been presented.</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>OR TC 145</p> <p>9.1: "The first step to settle a complaint/dispute should be to report it to the chairman of the TC. For this purpose, the SSB should establish at least one specific, easily accessed contact point for sending complaints/disputes concerning the standardisation process, such as a specific e-mail address".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The procedures require to establish one specific and easily accessed contact point for sending complaints.</p>
	Process	YES	<p>PEFC Portugal established at its website a section dedicated to complaints that also provides contact details for complaints relating to the standard setting (both, contacts to ICNF as well as to PEFC Portugal), (https://www.pefc.pt/contactos/reclamacoes)</p> <p>The IPQ has a contact point (entry) for complaints at its website: https://forms.office.com/pages/responsepage.aspx?id=48A87UjX1Eiqrc9CnP5RZ33pXaG37QlOucvP-MM2DoVURUE1MkM0MEo2TFgwQTRDQlkWUEtOVUVUQSQIQCN0PWcu</p> <p>The ICNF established contact point for complaints at its website: www.icnf.pt with a direct link to an email address for submitting a complaint.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>All three organisations, involved in the governance and management of the standard setting process established a contact point for complaints.</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
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	NO	<p>RPNP 03/2020</p> <p>The document requires the Technical Committee and the SSB to develop a “Standardisation Program” with the intention of the development of new standards and revision of existing standards (12.5.3a). The “Standardisation Programs” shall be communicated to the IPQ using a predefined form of Mod-DNOR-01-01 and Mod-DNOR-01-14 (12.5.3a).</p> <p>The “Standardisation Programme” shall be updated annually following the development of annual plan of activities that is an integral part of the “Standardisation Program” (12.5.3b).</p> <p>Development of each standard shall be based on a “Project Management” approach (1 standard = 1 project) that shall be documented, including phases, deadlines and bodies responsible for their execution. The compliance shall be monitored by the SSB (12.5.3c, 12.5.1):</p> <p>12.5.3c: “The Technical Commission must establish, at the beginning of each drafting project, a normative document of its Standardization Program, the expected completion date, the intermediate deadlines and those responsible for the execution of the different phases of this project. The Technical Commission must report the progress to the organism that coordinates it, so that measures preventive and corrective measures can be implemented in a timely manner, with a view to complying with the Estimated date of completion.”</p> <p>Compliance: Minor non-conformity</p> <p>Justification:</p> <p>The IPQ Procedures RPNP 030/2020 require the Technical Committee to develop a Standardisation Programme, plan of activities and description of the standardisation process, including phases, deadlines and responsibilities. This approach is compatible with the “Project Proposal” of PEFC ST 1001:2017.</p> <p>Proposals for new standards and proposed revision of existing standards shall be communicated to the IPQ using a predefined form (Mod-DNOR-01-01, Mod-DNOR-01-14).</p> <p>The minor non-conformity has been assigned based on the fact that RPNP 030/2020 does not define the content of the “Standardisation Program”(except for “phases, deadlines and responsibilities”) and the referenced Forms have not been submitted for the assessment.</p>
	Process	YES	<p>ICNF developed a proposal for the revision of NP 4406 standard (PROJECT SYNOPSIS REVISION OF THE PORTUGUESE STANDARD 4406: 2014)^[5] that clearly describes the scope of the revision work.</p> <p>Compliance: Conformity</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>Justification:</p> <p>ICNF developed a proposal for the revision of NP 4406 standard (PROJECT SYNOPSIS REVISION OF THE PORTUGUESE STANDARD 4406: 2014)^[5] that clearly describes the scope of the revision work.</p> <p>The document was presented to and approved by TC 145 at its meeting held on 4 April 2019^[6].</p>
(b) a justification of the need for the standard,	Procedures	NO	<p>See 6.1.1a</p> <p>Compliance: Minor non-conformity</p> <p>Justification:</p> <p>The IPQ Procedures RPNP 030/2020 require the Technical Committee to develop a Standardisation Programme, plan of activities and description of the standardisation process, including phases, deadlines and responsibilities. This approach is compatible with the "Project Proposal" of PEFC ST 1001:2017.</p> <p>Proposals for new standards and proposed revision of existing standards shall be communicated to the IPQ using a predefined form (Mod-DNOR-01-01, Mod-DNOR-01-14).</p> <p>The minor non-conformity has been assigned based on the fact that RPNP 030/2020 does not define the content of the "Standardisation Program" (except for "phases, deadlines and responsibilities) and the referenced Forms have not been submitted for the assessment.</p>
	Process	YES	<p>ICNF developed a proposal for the revision of NP 4406 standard^[5] that describes justification of the need of the revision.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>ICNF developed a proposal for the revision of NP 4406 standard^[5] describes justification of the need of the revision.</p>
(c) a clear description of the intended outcomes	Procedures	NO	<p>See 6.1.1a</p> <p>Compliance: Minor non-conformity</p> <p>Justification:</p> <p>The IPQ Procedures RPNP 030/2020 require the Technical Committee to develop a Standardisation Programme, plan of activities and description of the standardisation process, including phases, deadlines and responsibilities. This approach is compatible with the "Project Proposal" of PEFC ST 1001:2017.</p> <p>Proposals for new standards and proposed revision of existing standards shall be communicated to the IPQ using a predefined form (Mod-DNOR-01-01, Mod-DNOR-01-14).</p> <p>The minor non-conformity has been assigned based on the fact that RPNP 030/2020 does not define the content of the "Standardisation Program" (except for "phases, deadlines and responsibilities) and the referenced Forms have not been submitted for the assessment.</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
	Process	YES	<p>ICNF developed a proposal for the revision of NP 4406 standard^[5] that describes intended outcomes of the revision.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>ICNF developed a proposal for the revision of NP 4406 standard^[5] describes intended outcomes of the revision.</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 	Procedures	NO	<p>See 6.1.1a</p> <p>Compliance: Minor non-conformity</p> <p>Justification:</p> <p>The IPQ Procedures RPNP 030/2020 require the Technical Committee to develop a Standardisation Programme, plan of activities and description of the standardisation process, including phases, deadlines and responsibilities. This approach is compatible with the "Project Proposal" of PEFC ST 1001:2017.</p> <p>Proposals for new standards and proposed revision of existing standards shall be communicated to the IPQ using a predefined form (Mod-DNOR-01-01, Mod-DNOR-01-14).</p> <p>The minor non-conformity has been assigned based on the fact that RPNP 030/2020 does not define the content of the "Standardisation Program" (except for "phases, deadlines and responsibilities) and the referenced Forms have not been submitted for the assessment.</p>
	Process	N/A	<p>ICNF developed a proposal for the revision of NP 4406 standard^[5]. The document does not include a risk assessment of potential negative impacts.</p> <p>Compliance: Not applicable</p> <p>Justification:</p> <p>ICNF developed a proposal for the revision of NP 4406 standard^[5]. The document does not include a risk assessment of potential negative impacts.</p> <p>However, PEFC requirement 6.1.1d is not applicable for revision of an existing standard (see 6.1.2) and as such this is not classified as non-conformity.</p>
(e) a description of the stages of standard development and their expected timetable.	Procedures	YES	<p>RPNP 03/2020</p> <p>The document requires the Technical Committee and the SSB to develop a "Standardisation Program" with the intention of the development of new standards and revision of existing standards (12.5.3a). The "Standardisation Programs" shall be communicated to the IPQ using a predefined form of Mod-DNOR-01-01 and Mod-DNOR-01-14 (12.5.3a).</p> <p>The "Standardisation Programme" shall be updated annually following the development of annual plan of activities that is an integral part of the "Standardisation Program" (12.5.3b).</p> <p>Development of each standard shall be based on a "Project Management" approach (1 standard = 1 project) that shall be documented, including phases, deadlines and bodies responsible</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>for their execution. The compliance shall be monitored by the SSB (12.5.3c, 12.5.1):</p> <p>12.5.3c: "The Technical Commission must establish, at the beginning of each drafting project, a normative document of its Standardization Program, the expected completion date, the intermediate deadlines and those responsible for the execution of the different phases of this project. The Technical Commission must report the progress to the organism that coordinates it, so that measures preventive and corrective measures can be implemented in a timely manner, with a view to complying with the Estimated date of completion."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The IPQ Procedures RPNP 030/2020 require the Technical Committee to develop a Standardisation Programme, plan of activities and description of the standardisation process, including phases, deadlines and responsibilities. This approach is compatible with the "Project Proposal" of PEFC ST 1001:2017.</p> <p>Proposals for new standards and proposed revision of existing standards shall be communicated to the IPQ using a predefined form (Mod-DNOR-01-01, Mod-DNOR-01-14).</p>
	Process	YES	<p>ICNF developed a proposal for the revision of NP 4406 standard^[5] that describes individual stages of the revision process.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>ICNF developed a proposal for the revision of NP 4406 standard^[5] that describes individual stages of the revision process.</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	NO	<p>See 6.1.1a</p> <p>Compliance: Minor non-conformity</p> <p>Justification:</p> <p>The IPQ Procedures RPNP 030/2020 require the Technical Committee to develop a Standardisation Programme, plan of activities and description of the standardisation process, including phases, deadlines and responsibilities. This approach is compatible with the "Project Proposal" of PEFC ST 1001:2017.</p> <p>Proposals for new standards and proposed revision of existing standards shall be communicated to the IPQ using a predefined form (Mod-DNOR-01-01, Mod-DNOR-01-14).</p> <p>The minor non-conformity has been assigned based on the fact that RPNP 030/2020 does not define the content of the "Standardisation Program", the scope of the standard (6.1.1a) and the referenced Forms have not been submitted for the assessment.</p> <p>The Procedures require the "Standardisation Program" to define "phases, deadlines and responsibilities" (6.1.1e).</p>
	Process	YES	<p>Compliance: Conformity</p>

PEFC benchmark requirement	Assess. basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>Justification:</p> <p>The proposal document^[5] includes all elements that are required for the revision process.</p>
<p>6.2.1 The standardising body shall identify stakeholders relevant to the objectives and scope of the standard-setting activities by means of a stakeholder identification mapping exercise. It shall define which stakeholder groups are relevant to the subject matter and why. For each stakeholder group the standardising body shall identify the likely key issues, key stakeholders, and which means of communication would be best to reach them.</p>	Procedures	YES	<p>RPNP 030/2020</p> <p>The document requires to identify relevant stakeholder categories and a list of entities that have shown an interest in the TC work. A general list of stakeholder categories is shown in Annex A.</p> <p>OR TC 145</p> <p>4: "In view of this principle, the SSB shall require national representatives of the FSC and PEFC to carry out a documented mapping exercise that includes determining which are the relevant categories of stakeholders, identifying the people, groups or organizations and the most suitable ways for the respective contact.</p> <p>This exercise, to be ratified by TC 145, shall ensure the identification of criteria for the recognition of "directly affected stakeholders", "disadvantaged stakeholders" and "key stakeholders", identifying which stakeholders are in these conditions. It should also define how to promote their participation and contribution to standardization activities, in particular, looking for a proactive way of involving "disadvantaged stakeholders".</p> <p>OR TC 145 also specifies the stakeholders categories for which the stakeholders mapping shall be developed.</p> <p>PEFC PT GUIDE 1005</p> <p>The procedural document that complements RPNP 030/2020 and OR TC 145 defines detailed procedures for stakeholder mapping carried out by PEFC Portugal.</p> <p>7.1: "At this stage, a stakeholder map ("PIs_ONS Map") should be prepared and maintained, grouping them with the necessary information to be transmitted to TC 145 (e.g. means of communication) and promote to PEFC Portugal the registration of the rationale prepared for the ongoing evaluation process, which includes the following information:</p> <ul style="list-style-type: none"> – name and contact details (including geographic location); – the category of stakeholders to which they belong, according to the framework of TC 145 rules based on RPNP 030 (if necessary, consult the Registration Forms filled in by the members); – the subjects that are most likely to be of interest to each category (Topics of interest for participation); – other information deemed relevant". <p>In addition, the description of stakeholder categories in the document (6) defines key topics / interests of the individual stakeholder categories in the standardisation process.</p> <p>Compliance: Conformity</p> <p>Justification:</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>The procedures require that the SSB (ICNF) shall ask the national PEFC representative to carry out a stakeholders mapping exercise, including identification of stakeholder categories, relevant organisations and means of communication with them.</p> <p>Procedures of PEFC Portugal (PEFC PT GUIDE 1005) includes elements of the stakeholders identification that complies with the PEFC requirement.</p>
	Process	YES	<p>The applicant provided a stakeholders mapping table^[2] with detailed stakeholders mapping which identifies a large number of stakeholders, identifies their nature (key, disadvantages, contact details and means of communication).</p> <p>Concerning the identification of likely issues for individual stakeholder categories, those are available from the table of stakeholder categories in RPNP 030/2020 and PEFC PT Guide 1005.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The stakeholder mapping identified relevant stakeholders, defined their nature (key, disadvantaged) and means of communication. The “likely issues” for the stakeholder categories are already included in the procedural documents.</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, 	Procedures	YES	<p>OR TC 145</p> <p>The procedures identify in chapter 4.1 the following stakeholders categories:</p> <ul style="list-style-type: none"> - Industries and Trade (A), - Forest Owners Organisations (A0), - Small and medium enterprises (A1), - Public administration (B), - Consumers (C), - Consumer social group (C1), - Labor (D), - Research centers and higher education institutions (E), - Managing and Implementation of the standards (F), - Non-governmental Organisations (G), - Non-governmental Environmental Protection Organisations (G1). <p>Compliance: Conformity</p> <p>Justification:</p> <p>OR TC 145 complies with the PEFC requirement. The category of indigenous peoples is not relevant to the conditions of the Portugal. In addition, it sets up additional more detailed groups that are relevant to the national standardization work.</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
<p>• workers and trade unions.</p> <p>Other groups shall be added if relevant to the scope of standard-setting activities.</p>	Process	YES	<p>The applicant provided a stakeholders mapping document^[2] identifying the following relevant stakeholder categories and individual stakeholders belonging to those categories. The number in brackets shows a number of identified stakeholders under each category:</p> <ul style="list-style-type: none"> - Industries and Trade (96), - Forest Owners Organisations (217), - Small and medium enterprises (25), - Public administration (130), - Consumers (2), - Consumer social group (4), - Labor (4), - Research centers and higher education institutions (121), - Managing and Implementation of the standards (69), - Non-governmental Organisations (131), - Non-governmental Environmental Protection Organisations (154). <p>Compliance: Conformity</p> <p>Justification:</p> <p>The stakeholders mapping complies with the PEFC requirement. The category of indigenous peoples is not relevant to the conditions of Portugal. In addition, it sets up additional stakeholder groups.</p>
<p>6.2.3 The standardising body shall identify disadvantaged stakeholders and key stakeholders and address any constraints to their participation in standard-setting activities.</p> <p>NOTE A stakeholder can be both a disadvantaged and a key stakeholder at the same time.</p>	Procedures	YES	<p>OR TC 145</p> <p>6.1: "In view of this principle, the SSB shall require national representatives of the FSC and PEFC to carry out a documented mapping exercise that includes determining which are the relevant categories of stakeholders, identifying the people, groups or organizations and the most suitable ways for the respective contact.</p> <p>This exercise, to be ratified by TC 145, shall ensure the identification of criteria for the recognition of "directly affected stakeholders", "disadvantaged stakeholders" and "key stakeholders", identifying which stakeholders are in these conditions. It should also define how to promote their participation and contribution to standardization activities, in particular, looking for a proactive way of involving "disadvantaged stakeholders".</p> <p>OR TC 145 also specifies the stakeholders categories for which the stakeholders mapping shall be developed".</p> <p>PEFC PT GUIDE 1005</p> <p>5.2 "Disadvantaged stakeholders can be identified based on the following aspects:</p> <ul style="list-style-type: none"> - Existence of financial limitations that make it impossible for them to participate in TC 145 works; - Existence of limitations of technical/human resources to be represented in TC 145; - Difficulties in accessing information (e.g., lack of digital media);

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>– Potential social impacts of forest management activities and forest products on their lives, as is the example of local communities, workers and final consumers”.</p> <p>5.3: “Key stakeholders should be identified based on the following aspects:</p> <p>– Relevant theoretical knowledge and/or practical experience in the area;</p> <p>– Representation of points of view corresponding to the various categories of interest</p> <p>Note: Stakeholders who can influence their implementation. E.g., Ministry of Agriculture, ICNF</p> <p>– Representation of the points of view of small, medium and large forestry producers and companies affected by the normative works developed by TC 145”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Procedures (OR TC 145) require to identify affected, key and disadvantaged stakeholders and also to define how to promote their participation in the standard setting. PEFC PT GUIDE 1005 then specifies conditions to be taken into consideration in identification of disadvantaged and key stakeholders.</p>
	Process	YES	<p>The applicant provided a stakeholders mapping document^[2] identifying relevant stakeholders and identifying for each stakeholder organisation whether it belongs to “affected stakeholder”, “key stakeholder” or “disadvantaged stakeholder”. The document also specifies the communication means to promote participation of those stakeholders.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The stakeholders mapping identified key stakeholders and disadvantaged stakeholders categories. The standardization body was addressing communication constraints of the identified stakeholders by using different communication channels and providing internet solution to one stakeholder.</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	Procedures	YES	<p>OR TC 145</p> <p>6.1: “The announcement/invitation about the beginning of a process of elaboration and/or revision of a standardization documents must be carried out by the SSB in conjunction with TC 145 and with the PEFC and FSC certification systems, in a timely and appropriate manner. This announcement must include:</p> <ul style="list-style-type: none"> - Information on the objectives, scope and steps of the standardization process as well as the timetable for its completion; - Information on forms of participation and involvement in the standardization process;

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
<p>appropriate, to give stakeholders an opportunity for meaningful contributions.</p> <p>NOTE 1 <i>In a timely manner</i> means (at the latest) four weeks before the first standard-setting activity is scheduled to occur.</p> <p>NOTE 2 <i>Through suitable media</i> means at least through the standardising body's website and by email and/or letter to identified stakeholders. Other media includes press releases, news articles, features in trade-press, information sent to branch organisations, social media, digital media, etc.</p>			<ul style="list-style-type: none"> - Invitation to nominate stakeholder representatives in TC 145. The invitation to interested parties must be made in a way that ensures that it is received and that it contains all the necessary elements to allow an informed response, including acceptance of public availability the records produced by CT 145 (work orders, notice, minutes and attendance lists); - The invitation to comment on the scope of the work and on the details of the standardization process to be initiated/reviewed; - Information on the public availability of procedures associated with the standardization process". <p>Note 1: In the case of new standardization documents, information on the reasons that justify their preparation, scope and expected results.</p> <p>Note 2: A timely period is understood to be a period of not less than 4 weeks from the first standardization activity.</p> <p>Note 3: The disclosure of the announcement/invitation on the ONN website, via email and/or letter addressed to the interested parties identified in the mapping exercise, is understood as an appropriate way. Other dissemination formats may include press releases, news, advertisements in sectoral magazines/newspapers, information sent to affiliated organizations, social networks, digital media, etc".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>OR TC 145 requires the public announcement to be done through the website, email and/or letter addressed to interested parties identified in the mapping exercise. The term "timely manner" requires the announcement to be made at least four weeks before the first standardization activity.</p>
	Process	YES	<p>The announcement of the start of the NP 4406 standard has been made by:</p> <ul style="list-style-type: none"> d) News at the PEFC Portugal website^[7] (28 October 2019); e) Letters / Emails distributed to all stakeholders identified in the stakeholders mapping exercise sent on 24 October 2019^[8, 9]. f) Reminder email distributed to all stakeholders on 21 November 2019^[10]. <p>Compliance: Conformity</p> <p>Justification:</p> <p>The announcement was published at the PEFC Portugal^[7]. ICNF also sent emails with a letter and synopsis of the revision project to all stakeholders identified in the stakeholders mapping^[8,9,10]. The announcement was made 5 weeks before the appointment of new members of TC 145 (3 December 2019).</p>
6.3.1 The announcement and invitation shall include:			

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
(a) overview of the standard-setting process,	Procedures	YES	<p>OR TC 145</p> <p>See 6.3.1 above.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The procedures require the announcement to include information on the objectives, scope and steps of the standardization process as well as the timetable for its completion.</p>
	Process	YES	<p>The announcement at the website^[7] and the announcement/invitation letter^[8,9] included brief description of the revision process and its organisational structure. They both made reference to the synopsis of the revision process that provides detailed description of the revision process, including its timetable.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The announcement includes overview of the revision process.</p>
(b) access to the proposal for the standard (refer to 6.1),	Procedures	YES	<p>OR TC 145</p> <p>See 6.3.1 above.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The procedures do not explicitly require that the announcement shall include access to the “proposal for the standard”. However, the procedures require the announcement to include information on the objectives, scope and steps of the standardization process as well as the timetable for its completion. In addition, Note 1 states that “in the case of new standardization documents, information on the reasons that justify their preparation, scope and expected results”.</p> <p>This wording covers the content of the “Proposal for the standard” as defined by PEFC requirement 6.1.1 and it is ensured that the content of the proposal is a part of the Announcement.</p>
	Process	YES	<p>The announcement at the website^[7] and the announcement/invitation letter^[8,9] included brief description of the revision process and its organisational structure. They both made reference to the synopsis of the revision process^[5] that provides detailed description of the revision process, including its timetable.</p> <p>The email communication^[8] included the synopsis^[5] as an attachment to the email.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The announcement includes reference to the “Synopsis” and its content satisfies the requirements for the “Proposal”.</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
(c) information about opportunities for stakeholders to participate in the process,	Procedures	YES	<p>OR TC 145</p> <p>See 6.3.1 above.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The procedures require the announcement to include information about the opportunities to participate in the process.</p>
	Process	YES	<p>The announcement at the website^[7] and the announcement/invitation letter^[8,9] included description of the stakeholders opportunities to participate in the process, either to nominate its representatives to TC 145 or to participate in public consultation.</p> <p>The PEFC website includes a dedicated site description stakeholders opportunities to participate in the revision process.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The announcement includes description of the stakeholders opportunities to participate.</p>
(d) requests to stakeholders to nominate their representative(s) or themselves to the working group (refer to 6.4). The request to disadvantaged stakeholders and key stakeholders shall be made in a manner that ensures that the information reaches intended recipients and in a format that is easy to understand,	Procedures	YES	<p>OR TC 145</p> <p>See 6.3.1 above.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The procedures require the announcement to include invitation to nominate stakeholder representatives in TC 145. The invitation to interested parties must be made in a way that ensures that it is received and that it contains all the necessary elements to allow an informed response, including acceptance of public availability the records produced by CT 145 (work orders, notice, minutes and attendance lists).</p>
	Process	YES	<p>The announcement at the website^[7] and the announcement/invitation letter^[8,9] included an explicit invitation to nominate a representative to TC 145. It described to scope of the work of TC 145, its organisational framework as well as provided a nomination form.</p> <p>The announcement / invitation was sent by email to all identified stakeholders.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The announcement includes invitation to participate in TC 145. The email communication ensures that the message reaches the recipient and wording, explanation and description of the stakeholders' role is clear and understandable.</p>

PEFC benchmark requirement	Assessment basis	YES/NO	Reference to system documentation (including quotation of relevant text)
(e) explicit invitation and clear instruction on how to submit feedback on the scope and standard-setting process, and	Procedures	YES	<p>OR TC 145</p> <p>See 6.3.1 above.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The procedures require the announcement to include invitation to comment on the scope of the work and on the details of the standardization process to be initiated/reviewed.</p>
	Process	YES	<p>The announcement at the website^[7] and the announcement/invitation letter^[8,9] included an invitation to submit comments to the proposed revision process as described in the Synopsis^[5].</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The announcement includes invitation to comment on the proposed revision process.</p>
(f) access to the standard-setting procedures.	Procedures	YES	<p>OR TC 145</p> <p>See 6.3.1 above.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The procedures require the announcement to include information on the public availability of procedures associated with the standardization process.</p>
	Process	YES	<p>The announcement at the website^[7] and the announcement/invitation letter^[8,9] included reference to the site dedicated to stakeholders participation with description of the structure and role of TC 145^[11]. The website also references the TC 145 procedures included an invitation to submit comments to the proposed revision process as described in the Synopsis^[12].</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The announcement provides access to TC 145 procedures (OR TC 145).</p>
6.3.2 The standardising body shall review the standard-setting process based on feedback received in response to the public announcement.	Procedures	YES	<p>OR TC 145</p> <p>6.1 “TC145 shall review the procedure for the standardization process based on stakeholder comments received in connection with the announcement”.</p> <p>Compliance: Conformity</p> <p>Justification:</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			OR TC 145 satisfies the PEFC requirement.
	Process	YES	<p>The applicant claims^[3] that no comment relating to the standard setting process was received as a outcome of the announcement of the revision process.</p> <p>TC 145 met on 3 December 2019^[13] and confirmed the standard setting process as proposed on 4 April 2019.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The applicant claims that it had received no comments. The claim was verified during the in-country visit during interviews of key stakeholders.</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.	Procedures	YES	<p>OR TC 145</p> <p>4.3 "Participation in TC 145 is voluntary, not remunerated and open to all interested parties who request or are invited. Any stakeholder wishing to be admitted as a member shall make their request in writing, to the president and/or secretary and/or to the NSB. In this request, the stakeholder must indicate the category of interests that they represent and their work functions. If the stakeholder represents an entity, the request must be accompanied by its own credentials indicating the names of the respective representatives, candidate for members, signed by its legal representatives.</p> <p>The acceptance or not of new members is decided in a plenary meeting in accordance with the present Operating Rules. In case of refusal of admission, the reasons for non-acceptance must be indicated in writing to the interested party."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Procedures satisfies the PEFC requirement for creation of the "working group" (Technical Committee) where acceptance/rejection of nominations shall be justified.</p>
	Process	YES	<p>Based on the announcement/invitation^[7, 8, 9, 10], the TC 145 accepted, on 3 December 2019) all received nominations and reconvened the permanent Technical Committee TC 145^[12].</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>All received nominations were accepted.</p>
6.4.2 The working group shall:			
(a) have balanced representation and decision-making by stakeholder categories,	Procedures	YES	<p>OR TC 145</p> <p>4 "It is responsibility of the SSB to develop the necessary actions to ensure adequate representation of TC 145, as well as the periodic reassessment of the interests represented, aiming to lead</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
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>a balanced composition of stakeholders relevant to forest management, seeking a balanced composition of gender, so that can consider the result of the work as translating the national consensus.”</p> <p>Chapter 4.1 defines stakeholder categories with aim to achieve balanced representation of the stakeholder categories:</p> <ul style="list-style-type: none"> - Industries and Trade (A), including forest owners - Small and medium enterprises (A1), - Public administration (B), - Consumers (C), - Labor (D), - Research centres and higher education institutions (E), - Managing and Implementation of the standards (F), - Non-governmental Organisations (G), - Non-governmental Environmental Protection Organisations (G1). <p>Chapter 6.2 defines decision making rules where each member has one vote.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The procedures define stakeholder categories and makes reference to balanced representation on TC 145. The standard is developed for Spain at the national level and stakeholders are expected to represent the geographical scope.</p>
	Process	NO	<p>The TC consists of 73 voting members plus Chairman with balance amongst the defined categories. In addition, TC 145 also includes a large number on “non-voting members”, usually additional representatives of the voting member organisation:</p> <ul style="list-style-type: none"> - Industries and Trade (A), incl. forest owners - 25, - Small and medium enterprises (A1) - 7, - Public administration (B) - 13, - Consumers (C) – 0 (one non-voting), - Labor (D) - 0, - Research centres and higher education institutions (E) - 9, - Managing and Implementation of the standards (F) - 10, - Non-governmental Organisations (G) - 3, - Non-governmental Environmental Protection Organisations (G1) - 5. <p>The membership of the Forum is shown in Annex F.</p> <p>Compliance: Minor non-conformity</p> <p>Justification:</p> <p>TC 145 covers a large number of stakeholders (73) that are divided into individual stakeholder categories. TC 145 allows participation of all interested stakeholders and does not provide any quorum for individual stakeholder categories.</p> <p>Information on individual members and their affiliation to a specific stakeholder category, Sub-committees and Working Groups is</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>kept in an information system that has been developed and is administered by the IPQ.</p> <p>It should be noted that the TC 145 is always open to new members and also existing members can leave the Technical Committee. Therefore, the number of the members is changing in time.</p> <p>Minor non-conformity has been assigned based on lacking participation of an organization representing trade unions and workers' interest.</p> <p>It should be noted that the minutes of the TC meeting 98^[13] includes information that one member of TC 145 has been classified under stakeholder category D (trade unions and workers). However, a formal list of members of TC 145^[50] does not include an organization representing trade unions or workers' interest classified under stakeholder category D and even from the list of the TC 145 it is not evident that some member organization would represent workers' interest (See Annex F).</p> <p>PEFC Portugal has not presented evidence that would demonstrate that PEFC Portugal's or TC 145 implemented proactive actions to contact the stakeholders within the category D and encourage their participation, except the initial invitation of stakeholders to join the Technical Committee.</p> <p>Observation</p> <p>The representation of stakeholders in TC 145 has prevailing economic interest (A, B) that significantly outnumbers stakeholders in other categories, especially C-G.</p> <p>The functioning of Technical Committees under the Portuguese national standardization (as defined by RPNP 030/2020) does not limit a number of members of the TCs representing different stakeholder categories. This provides increased opportunity for stakeholders interested in the process to participate but, at the same time, brings challenges relating to a large number of TC members affiliated to some stakeholder categories.</p> <p>To resolve this challenge, RPNP 030/2020 requires the Chairman of Technical Committees to ensure that all views are properly presented, to mediate different positions to achieve a consensus and to ensure representativeness and effectiveness of the Technical Committee (RPNP 030/2020, 8.4.3).</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>OR TC 145</p> <p>4 "It is responsibility of the SSB to develop the necessary actions to ensure adequate representation of TC 145, as well as the periodic reassessment of the interests represented, aiming to lead a balanced composition of stakeholders relevant to forest management, seeking a balanced composition of gender, so that can consider the result of the work as translating the national consensus."</p> <p>Chapter 4.1 defines stakeholders categories with aim to achieve balanced representation of the stakeholder categories:</p> <ul style="list-style-type: none"> - Industries and Trade (A), - Forest Owners Organisations (A0), - Small and medium enterprises (A1), - Public administration (B),

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<ul style="list-style-type: none"> - Consumers (C), - Consumer social group (C1), - Labor (D), - Research centers and higher education institutions (E), - Managing and Implementation of the standards (F), - Non-governmental Organisations (G), - Non-governmental Environmental Protection Organisations (G1). <p>Compliance: Conformity</p> <p>Justification:</p> <p>The procedures define stakeholder categories and makes reference to balanced representation on TC 145.</p> <p>The categories definition delivers sufficient competence and expertise of its members in SFM especially categories A, B, D, E). The research and academic knowledge is primarily delivered through Category E.</p>
	Process	YES	<p>The TC 145 consists of 73 voting members plus Chairman with balance amongst the defined categories. In addition, TC 145 also includes a large number on “non-voting members”, usually additional representatives of the voting member organisation:</p> <ul style="list-style-type: none"> - Industries and Trade (A), incl. forest owners - 25, - Small and medium enterprises (A1) - 7, - Public administration (B) - 13, - Consumers (C) – 0 (one non-voting), - Labor (D) - 0, - Research centres and higher education institutions (E) - 9, - Managing and Implementation of the standards (F) - 10, - Non-governmental Organisations (G) - 3, - Non-governmental Environmental Protection Organisations (G1) - 5. <p>It should be noted that the formal records of membership affiliated to specific stakeholders categories^[50] slightly differs from OR TC 145. This is likely to be caused by the fact that the formal records are kept in an information system developed by the IPQ which uses predefined stakeholder categories and does not take into account subcategories (e.g. A.0, or C1) included in OR TC 145.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>All members of TC 145 are considered as having expertise in SFM and particular expertise in their particular field of interest.</p> <p>A large number of participants in categories A, B, F are those affected by the implementation of the standard.</p>
6.4.3 In order to achieve balanced representation, the standardising body shall strive to have all identified stakeholder	Procedures	YES	<p>OR TC 145</p> <p>4 “It is responsibility of the SSB to develop the necessary actions to ensure adequate representation of TC 145, as well as the periodic reassessment of the interests represented, aiming to lead a balanced composition of stakeholders relevant to forest</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
<p>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>			<p>management, seeking a balanced composition of gender, so that can consider the result of the work as translating the national consensus.”</p> <p>Chapter 4.1 defines stakeholders categories with aim to achieve balanced representation of the stakeholder categories:</p> <ul style="list-style-type: none"> - Industries and Trade (A), - Forest Owners Organisations (A0), - Small and medium enterprises (A1), - Public administration (B), - Consumers (C), - Consumer social group (C1), - Labor (D), - Research centers and higher education institutions (E), - Managing and Implementation of the standards (F), - Non-governmental Organisations (G), - Non-governmental Environmental Protection Organisations (G1). <p>RPNP – 030/2020</p> <p>6.4:”Manage the composition of the Technical Committee, ensuring the balanced representation of the parties relevant stakeholders and its effective functioning:...</p> <p>6.4.2 Monitor the balance of stakeholder representation in the Technical Commission and propose to the body that coordinates it (3.3) the adoption of measures to increase the participation of unrepresented or underrepresented categories.”</p> <p>PEFC PT GUIDE 1005</p> <p>7.3 “In order to have the representation of stakeholders (categories and types) as balanced as possible, given the results obtained from participating in the work to be developed, PEFC Portugal should contact the categories and types of stakeholders with less representation.</p> <p>The measures to be taken should be proactive, in order to obtain a justification from the stakeholders, either for the refusal to participate or for the difficulty of responding directly to the invitation made by TC 145”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The procedures (OR TC 145) define stakeholder categories and makes reference to balanced representation on TC 145. The procedures do not set up any target for representation within individual categories. However, RPNP 030/2020 includes general requirements for balanced representation and ongoing monitoring of the balance of representation.</p> <p>The PEFC Portugal complementary procedures then include proactive measures to contact stakeholders within underrepresented category and support their participation.</p>
	Process	NO	<p>The TC 145 consists of 73 voting members plus Chairman with balance amongst the defined categories. In addition, TC 145 also includes a large number on “non-voting members”, usually additional representatives of the voting member organisation:</p> <ul style="list-style-type: none"> - Industries and Trade (A), incl. forest owners - 25,

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<ul style="list-style-type: none"> - Small and medium enterprises (A1) - 7, - Public administration (B) - 13, - Consumers (C) – 0 (one non-voting), - Labor (D) - 0, - Research centres and higher education institutions (E) - 9, - Managing and Implementation of the standards (F) - 10, - Non-governmental Organisations (G) - 3, - Non-governmental Environmental Protection Organisations (G1) - 5. <p>Compliance: Minor non-conformity</p> <p>Justification:</p> <p>TC 145 consists of a large number of stakeholders and all stakeholder categories, except category D (trade unions and workers) are represented.</p> <p>PEFC Portugal has not presented evidence that would demonstrate that PEFC Portugal's or TC 145 implemented proactive actions to contact the stakeholders within the category D and encourage their participation.</p>
6.4.4 Activities of the working group shall be organised in an open and transparent manner where:			
(a) working drafts shall be available to all members of the working group,	Procedures	YES	<p>OR TC 145</p> <p>5.3 The Secretariat of TC 145 is responsible for:</p> <ul style="list-style-type: none"> - "Ensure that the documents necessary for the operation of TC 145 are guaranteed, as well as all logistical support; - "Prepare, in accordance with the chairman's instructions, the notices for each TC 145 meeting, with the agenda and working documents to be distributed to the members, at least 15 days in advance; <p>Compliance: Conformity</p> <p>Justification:</p> <p>OR TC145 satisfies the PEFC requirement.</p>
	Process	YES	<p>During the revision process, TC 145 met 5 times, including preparatory meetings on 4 April 2019 and 3 December 2019.</p> <ul style="list-style-type: none"> - 4. April 2019 (No. 97)^[1], - 3 December 2019 (No. 98)^[2], - 7 March 2021 (No. 99, not related to NP 4406), - 22 October 2021 (No. 100), - 21 February 2022 (No. 101), <p>In addition, Subcommittee on NP 4406 (SC2) was responsible for preparing working documents of NP 4406 and met 7 times:</p> <ul style="list-style-type: none"> - 7 January 2020, - 30 June 2020, - 3 September 2020, - 7 October 2020, - 8 October 2020, - 8 February 2022,

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>- 9 February 2022.</p> <p>In addition, to TC 145 and SC, several WGs were established to discuss particular issues met on numerous occasions ^[15].</p> <p>The assessment focused on a sample of meetings and verified whether invitation, agenda and draft documentation were sent to members prior to the meetings. For all the sampled meetings, the participants received an invitation email (at least 2 weeks in advance) with an agenda and documentation associated to the agenda^[16-19].</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>Prior to meetings, the members of TC 145, subcommittees and also working groups received a written invitation (e-mail) to the meetings with an agenda and documentation associated to the meetings.</p>
(b) all members of the working group shall be given meaningful opportunities to contribute to the development or revision of the standard and to provide feedback on working drafts, and	Procedures	YES	<p>OR TC 145</p> <p>5.1 TC 145 shall:</p> <ul style="list-style-type: none"> - "Provide equal opportunities for members to contribute to the elaboration or revision of normative documents and to submit their comments on said documents"; - "Consider all comments and opinions of members, openly and transparently, in accordance with the procedures described in these Rules". <p>5.6 "Each member of the TC or SC and WG must ensure a level of attendance that does not affects the progress of the work and, in the event of their absence, must ensure their replacement by their alternate, while providing the secretary with a justification for their absence in due time. Each member of the TC or SC and WG must know and follow the Code of Conduct for members and experts of the Technical Standardization Commissions".</p> <p>6.1 "For the elaboration and/or revision of standardization documents, plenary meetings are organized with the aim of discussing the proposals for working documents and submitting them to the respective voting by the members. Meetings can be held in person or by email, according to the means deemed most convenient by TC145."</p> <p>The Secretariat of TC 145 is responsible for:</p> <p>6.4.4 "Activities of the Forum will be organized in an open and transparent manner whereby: all Forum members are given sufficient opportunities to contribute to the development or revision of the standard and to provide feedback on draft documents; and".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>OR TC 145 provides procedures for open and transparent work of TC 145,, Subcommittees and Working Groups and guarantees opportunities for stakeholders to contribute to the process.</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
	Process	YES	<p>The TC 145 met five times. In addition SC 2 responsible for NP 4406 revision met 7 times and multiple working groups met several times to discuss particular topics^[15]. The minutes of the meetings^[1, 13, 20-24] show that TC 145 as well as other associated bodies discussed all elements of the standard with general intention to achieve a consensus amongst stakeholders.</p> <ul style="list-style-type: none"> - TC 145 met 5 times during the period between April 2019 to February 2022, SC 2 met 7 times. - The meetings were well organised with clearly written and communicated agenda for each meeting. - The meetings were well attended by members of TC 145 as well as SC2. - The meetings provided sufficient time for discussion. <p>Compliance: Conformity</p> <p>Justification:</p> <p>TC 145 and SC 2 meetings were well organized and provided members with opportunities for meaningful contributions. TC 145 and each of SCs had their elected Chairperson that were responsible for facilitating the meetings and discussion. TC 145 and SC 2 were well supported by ICNF (the Secretariat) as well as PEFC Portugal were responsible for preparing draft documents based on outcomes of the meetings.</p>
(c) feedback and views given by any member of the working group shall be considered in an open and transparent way where the outcome of these considerations is recorded.	Procedures	YES	<p>OR TC 145</p> <p>5.1 TC 145 shall:</p> <ul style="list-style-type: none"> - "Provide equal opportunities for members to contribute to the elaboration or revision of normative documents and to submit their comments on said documents"; - "Consider all comments and opinions of members, openly and transparently, in accordance with the procedures described in these Rules". <p>5.3 The Secretariat of TC 145:</p> <p>"To act as a secretary during plenary meetings and draw up its minutes which must:</p> <ul style="list-style-type: none"> - Detail the comments and opinions presented by members, noting in particular any points that may have been the subject of considerable controversy or on which no consensus could be obtained, as well as any conclusions reached and proposals for changes; - Be sent in advance to the members, 15 days before each meeting for approval on the day of the meeting; - Be archived by the secretariat, to be made available for consultation by members or by other interested party. <p>5.6 "Each member of the TC or SC and WG must ensure a level of attendance that does not affects the progress of the work and, in the event of their absence, must ensure their replacement by their alternate, while providing the secretary with a justification for their absence in due time. Each member of the TC or SC and WG must</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>know and follow the Code of Conduct for members and experts of the Technical Standardization Commissions”.</p> <p>6.1 “For the elaboration and/or revision of standardization documents, plenary meetings are organized with the aim of discussing the proposals for working documents and submitting them to the respective voting by the members. Meetings can be held in person or by email, according to the means deemed most convenient by TC145.”</p> <p>The Secretariat of TC 145 is responsible for:</p> <p>6.4.4 “Activities of the Forum will be organized in an open and transparent manner whereby: all Forum members are given sufficient opportunities to contribute to the development or revision of the standard and to provide feedback on draft documents; and”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>OR TC 145 provides procedures for open and transparent work of TC 145 and consideration of comments raised by its members. The procedures also require keeping records of the meetings and their distribution to TC members.</p>
	Process	YES	<p>The minutes of the meetings have been kept and distributed to the TC 145 / SC 2 / WG members by email, either as a part of an agenda for the next meeting or as separate emails ^[25-28]. The agenda for each meeting also included approval of minutes from the last meeting^[16-19].</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The TC, SCs and Working Group meetings were well organized, their results were recorded in minutes and communicated to the members of the respective bodies.</p>
6.4.5 The decision of the working group to recommend the final draft for formal approval shall be taken on the basis of consensus. In order to determine whether there is any sustained opposition, the working group can utilise the following methods:			
(a) face-to face meeting(s) where there is a verbal yes/no vote, a show of hands for a yes/no vote; a statement on consensus from the Chair when there are no dissenting voices or hands (votes); a formal ballot, etc.,	Procedures	YES	<p>OR TC 145</p> <p>6.2 “The decision to approve standardization documents is the responsibility of the NSB, on the proposal of the SSB, after the approval of the prDNP, in the plenary of TC 145, carried out by consensus.”.</p> <p>“TC 145 members with voting rights exercise this right, through their respective voting member. Whenever more than one representative of a member is present at a TC 145 meeting (either effective or alternate members), only one has the right to vote.</p> <p>The decision is made according to the consensus definition.</p> <p>If necessary, at the plenary meeting, the Chairperson can determine the confirmation of the consensus, through a yes/no verbal vote.</p> <p>No single category of intervenient can dominate the decision-making process. If there is a negative vote between categories</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>regarding relevant matters, the situation must be resolved in accordance with the complaints/dispute's resolution procedure, described in point 8 of these Regulations".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The presence of consensus is determined by the Chairman of TC 145. If needed the Chairman can determine the consensus by Yes / NO vote.</p> <p>OR TC 145 does not explicitly determine whether the vote and "consensus" determination is conducted at face-to-face meetings or in "remote" meetings.</p> <p>TC 145 makes two stages decision, the first consensus vote shall be achieved to move a draft standard to public consultation stage; the second vote is to recommend the final standard for approval by the SSB.</p>
	Process	N/A	<p>Compliance: Not applicable</p> <p>Justification:</p> <p>The TC 145 decision was made at the teleconference meeting No. 100 and 101. See 6.4.5, bullet point (b).</p>
(b) telephone conference meeting(s) where there is a verbal yes/no vote,	Procedures	YES	<p>OR TC 145</p> <p>See 6.4.5a.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The presence of consensus is determined by the Chairman of TC 145. If needed the Chairman can determine the consensus by Yes / NO vote.</p> <p>OR TC 145 does not explicitly determine whether the vote and "consensus" determination is conducted at face-to-face meetings or in "remote" meetings.</p> <p>TC 145 makes two stages decision, the first consensus vote shall be achieved to move a draft standard to public consultation stage; the second vote is to recommend the final standard for approval by the SSB.</p>
	Process	YES	<p>Compliance: Conformity</p> <p>Justification:</p> <p>Following the TC 145 procedures (OR TC 145), TC 145 makes consensus-based decisions in two stages. Firstly, it shall approve a draft standard to be submitted to public consultation (and pilot testing) and then secondly, it shall approve a final standard to be sent to IPQ final approval.</p> <p>The decision of TC 145 to submit a draft standard NP 4406 for public consultation was made at the TC 145 meeting No. 100 held on 22 October 2021^[29]. The decision was made with 39 votes in favor and 3 abstention.</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>The decision of TC 145 to submit a draft standard NP 4406 for formal approval to IPQ was made at the TC 145 meeting No. 101 held on 21 February 2022 ^[23]. The decision was made with 29 votes in favor and 3 abstention (34 voting members).</p> <p>Due to COVID restrictions, both meetings were organized as teleconference meetings.</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>OR TC 145</p> <p>See 6.4.5a.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The presence of consensus is determined by the Chairman of TC 145. If needed the Chairman can determine the consensus by Yes / NO vote.</p> <p>OR TC 145 does not explicitly determine whether the vote and “consensus” determination is conducted at face-to-face meetings or in “remote” meetings.</p> <p>TC 145 makes two stages decision, the first consensus vote shall be achieved to move a draft standard to public consultation stage; the second vote is to recommend the final standard for approval by the SSB.</p>
	Process	N/A	<p>Compliance: Not applicable</p> <p>Justification:</p> <p>The TC 145 decision was made at the teleconference meeting No. 100 and 101. See 6.4.5, bullet point (b).</p>
(d) combinations of these methods.	Procedures	YES	<p>OR TC 145</p> <p>See 6.4.5a.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The presence of consensus is determined by the Chairman of TC 145. If needed the Chairman can determine the consensus by Yes / NO vote.</p> <p>OR TC 145 does not explicitly determine whether the vote and “consensus” determination is conducted at face-to-face meetings or in “remote” meetings.</p> <p>TC 145 makes two stages decision, the first consensus vote shall be achieved to move a draft standard to public consultation stage; the second vote is to recommend the final standard for approval by the SSB.</p>
	Process	N/A	<p>Compliance: Not applicable</p> <p>Justification:</p> <p>The TC 145 decision was made at the teleconference meeting No. 100 and 101. See 6.4.5, bullet point (b).</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
6.4.6 Where a vote is used in decision-making, the standard-setting procedures shall determine and include decision-making thresholds that quantifies consensus. The threshold must be consistent with the consensus definition (refer to 3.1). However, a majority vote cannot override sustained opposition in order to achieve consensus.	Procedures	YES	<p>OR TC 145</p> <p>6.4.6 “When voting is used as a decision-making mechanism, four of the eight votes from the spheres of interest are sufficient provided there is no well-founded opposition”.</p> <p>1: Consensus</p> <p>“Generalised acceptance, characterised by the absence of reasoned opposition to basic issues by any significant part of any of the categories represented and by a process that sought to consider the opinions of all interested parties and to reconcile divergent opinions, not necessarily implying “unanimity”.</p> <p>Note: In case of FSC, if a vote is necessary, the verification of consensus is defined as at least 66% of votes in favour in each of the three chambers”.</p> <p>6.2: “The meetings for the approval of a standardization working document (draft standardization document or another standard document) CT 145 must be able to approve normative proposals according to the consensus definition. To reach the decision it is necessary to obtain a simple majority of votes in favor, among the votes cast”.</p> <p>“No single category of intervenient can dominate the decision-making process. If there is a negative vote between categories regarding relevant matters, the situation must be resolved in accordance with the complaints/dispute’s resolution procedure, described in point 8 of these Regulations.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>A simple majority of present members of the TC 145 plenary meeting is sufficient to reach the decision. In addition to this threshold, the decision must also comply with the general definition of consensus and any negative vote between stakeholders categories shall be resolved using complaints/dispute procedures.</p> <p>The final approval of the standard is then made by the NSB (IPQ) and this body shall also resolve any objections raised by stakeholders.</p>
	Process	YES	Both voting at the TC 145 plenary meeting No 100 and 101 resulted in a majority approval with no negative votes ^[23,29] . See also PEFC requirement 6.4.5 above.
6.4.7 When there is sustained opposition to a substantial issue, the issue shall be resolved using the following methods:			
(a) finding a compromise through discussion and negotiation on the disputed issue within the working group,	Procedures	YES	<p>OR TC 145</p> <p>6.4.6 “When voting is used as a decision-making mechanism, four of the eight votes from the spheres of interest are sufficient provided there is no well-founded opposition”.</p> <p>1: Consensus</p> <p>“Generalised acceptance, characterised by the absence of reasoned opposition to basic issues by any significant part of any</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>of the categories represented and by a process that sought to consider the opinions of all interested parties and to reconcile divergent opinions, not necessarily implying “unanimity”.</p> <p>Note: In case of FSC, if a vote is necessary, the verification of consensus is defined as at least 66% of votes in favour in each of the three chambers”.</p> <p>6.2: “The meetings for the approval of a standardization working document (draft standardization document or another standard document) CT 145 must be able to approve normative proposals according to the consensus definition. To reach the decision it is necessary to obtain a simple majority of votes in favor, among the votes cast”.</p> <p>“No single category of intervenient can dominate the decision-making process. If there is a negative vote between categories regarding relevant matters, the situation must be resolved in accordance with the complaints/dispute’s resolution procedure, described in point 8 of these Regulations.</p> <p>“The draft document of a standardization document is approved by TC 145 and is sent to the SSB, with the “report on the approval of normative documents” prepared by the Chairman of TC 145, which describes the process and the results of the vote, with the proposal for submission to public inquiry. The NSB analyzes the documentation for:</p> <ul style="list-style-type: none"> - Consider the objections raised in CT 145; - Check the consistency of the draft standard with document RPNP – 040 and 041 and with existing standards; - Analyze any other technical or formal aspects <p>If there are no objections, the NSB shall validate the referred report based on the evidence of consensus and forward it to the SSB.</p> <p>If there are objections from the NSB, it returns the documents to TC 145, indicating the reasons that justify possible changes to the draft standard”.</p> <p>9: “It is up to the TC 145 plenary to analyze the complaint/dispute according to the following mechanisms:</p> <ul style="list-style-type: none"> - Discuss and mediate the matter in the TC with the aim of finding consensus; - Discuss and mediate the matter between the entities that presented the objection and entities with a different opinion in order to find consensus. <p>If this proves to be impossible, the existence of a conflict is confirmed and the TC must decide to create a Complaints/Dispute Resolution Working Group and elect its members:</p> <ul style="list-style-type: none"> - A coordinator; - One representative from each category of stakeholders, represented in the TC; - Secretariat. <p>Compliance: Conformity</p> <p>Justification:</p> <p>Both the definition of consensus (ch.1) as well as voting procedures (6.2) require resolution of “objections”. The procedures</p>

PEFC benchmark requirement	Assess. basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>require to apply dispute/complaints procedures (ch.9) for all objections (negative votes between the stakeholder categories). The dispute resolution process itself then define steps starting from discussion at the TC 145 plenary meeting, discussion between concerned parties and finally creation of a dispute Resolution WG. Therefore, the steps required by the PEFC requirement 6.4.7 are integrated into dispute resolution procedures.</p> <p>In addition, NCB (IPQ) is another safeguard level as it shall consider objection raised during the standard setting process, considers them and can decide to return the draft standard to TC 145 for further discussion.</p>
	Process	N/A	The final draft standard was approved with positive votes and abstentions with no negative vote (see PEFC requirement 6.4.6).
(b) finding a compromise through direct negotiation between the stakeholder(s) making the objection and other stakeholders with different views on the disputed issue,	Procedures	YES	<p>OR TC 145</p> <p>See description in 6.4.7a.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>See justification in 6.4.7a.</p>
	Process	N/A	The final draft standard was approved with positive votes and abstentions with no negative vote (see PEFC requirement 6.4.6).
(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>OR TC 145</p> <p>See description in 6.4.7a.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>See justification in 6.4.7a.</p>
	Process	N/A	The final draft standard was approved with positive votes and abstentions with no negative vote (see PEFC requirement 6.4.6).
6.4.8 When a substantial issue cannot be resolved and sustained opposition persists, the standardising body shall initiate dispute resolution in accordance with its procedures for impartial and objective action.	Procedures	YES	<p>OR TC 145</p> <p>See description in 6.4.7a.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>See justification in 6.4.7a.</p>
	Process	N/A	The final draft standard was approved with positive votes and abstentions with no negative vote (see PEFC requirement 6.4.6).
6.5.1 The standardising body shall organise public consultation on the enquiry draft and shall ensure that:			

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
<p>(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.</p>	Procedures	YES	<p>OR TC 145</p> <p>6.3 “In the case of a prDNP, the NSB is responsible for publicizing the public inquiry, ensuring that:</p> <ul style="list-style-type: none"> - Contains information on the beginning and end of the public inquiry period;... - It is published on the website of the SSB or other associations concerned;”. <p>“The SSB shall also send the invitation to the interested parties previously identified in the mapping exercise, in order to ensure that it is received and that it contains all the necessary elements to allow informed participation”.</p> <p>PEFC PT GUIDE 1005</p> <p>7.2: “The announcement of the invitation must be made at least one day before the beginning of the consultation, so PEFC Portugal must ensure that TC 145 will proceed accordingly, alerting to this fact when sending to TC 145 all the documentation prepared from the mapping of stakeholders to be consulted”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>OR TC 145 requires public consultation with clear identification of the start and end date. The public consultation shall be announced at the NSB website and other websites and also communicated by direct communication.</p> <p>The PEFC Portugal complementary documentation (PEFC PT GUIDA 1005 requires the announcement to be made at least one day before the consultation.</p> <p>It should be noted that the public consultation is formally organized by the IPQ (NSB) based on its procedure 040/2010. The work of the SSB (ICNF) and Portugal in this sense is supportive and complementary to the formal IPQ’s activities.</p>
	Process	YES	<p>The announcement of the public consultation that took place from 15 November 2021 to 14 January 2021 has been announced by the following means:</p> <ul style="list-style-type: none"> g) at the PEFC Portugal website on 15 November 2021^[34], h) at the NSB / IPQ website^[34], i) at the SSB / ICNF website on 3 December 2021^[31], j) At the PEFC Portugal LinkedIn profile^[35] k) at the NSB/ IPQ Newsletter^[36], l) at PEFC Portugal Facebook^[51]. <p>Compliance: Conformity</p> <p>Justification:</p> <p>The announcement was published at the IPQ and the PEFC Portugal website at the beginning of the standard setting process.</p> <p>The announcement was published on the same date as the start of the consultation and meets the PEFC interpretation of the term in “timely manner”.</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
(b) a direct invitation to comment on the enquiry draft is sent to each stakeholder identified by stakeholder identification mapping (refer to 6.2) aiming for a balanced participation of stakeholder groups,	Procedures	YES	<p>OR TC 145</p> <p>6.3 “The SSB shall also send the invitation to the interested parties previously identified in the mapping exercise, in order to ensure that it is received and that it contains all the necessary elements to allow informed participation”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>OR TC 145 requires to sent direct communication on public consultation to all stakeholders identified in the stakeholders mapping.</p>
	Process	NO	<p>Neither PEFC Portugal nor ICNF nor IPQ have invited stakeholders identified in the stakeholders mapping by a direct communication, i.e. mail or letter.</p> <p>PEFC Portugal claims that the announcement of the public consultation was published at the LinkedIn sites of the PEFC Portugal and IPQ. However, this claim cannot be verified due to LinkedIn posts being available only up to 12 months.</p> <p>On 16 November 2021 PEFC Portugal published the announcement of the public consultation on its Facebook and then s reminder on 17 December 2021. The PEFC Portugal Facebook has 1800 + followers^[51].</p> <p>In addition, the applicant provided evidence on a letter sent to one disadvantaged stakeholder^[32].</p> <p>Compliance: Minor non-conformity</p> <p>Justification:</p> <p>PEFC Portugal has not sent a direct mail or letter with an invitation to public consultation on the NP 4406 standard to stakeholders identified in the stakeholders mapping.</p> <p>However, it should be noted that PEFC Portugal and IPQ communicated the public consultation via social media (LinkedIn and Facebook) with reach to more than 1500 stakeholders. The social media is an appropriate communication channel to stakeholders and has a similar effect as direct mailing although this tool cannot guarantee that all stakeholders identified in the stakeholders mapping have been contacted.</p> <p>PEFC Portugal also argues that an extensive communication was made at the beginning of the process when stakeholders were contacted by direct mailing and information about the standard setting process also described foreseen public consultation.</p>
(c) invitations are sent to disadvantaged and key stakeholders by methods that ensure they reach recipients and are easy to understand,	Procedures	YES	<p>OR TC 145</p> <p>6.3 “The SSB shall also send the invitation to the interested parties previously identified in the mapping exercise, in order to ensure that it is received and that it contains all the necessary elements to allow informed participation”.</p> <p>Compliance: Conformity</p> <p>Justification:</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>OR TC 145 requires to sent direct communication on public consultation to all stakeholders identified in the stakeholders mapping. This also covers disadvantaged and key stakeholders.</p> <p>Direct mailing within the Portuguese conditions satisfies the type of communication that reaches the recipient and is understandable.</p>
	Process	NO	<p>Neither PEFC Portugal nor ICNF nor IPQ have invited stakeholders identified in the stakeholders mapping by a direct communication, i.e. mail or letter.</p> <p>PEFC Portugal claims that the announcement of the public consultation was published at the LinkedIn sites of the PEFC Portugal and IPQ. However, this claim cannot be verified due to LinkedIn posts being available only up to 12 months^[34].</p> <p>On 16 November 2021 PEFC Portugal published the announcement of the public consultation on its Facebook and then a reminder on 17 December 2021. The PEFC Portugal Facebook has 1800 + followers^[51].</p> <p>In addition, the applicant provided evidence on a letter sent to one disadvantaged stakeholder^[32].</p> <p>Compliance: Minor non-conformity</p> <p>Justification:</p> <p>PEFC Portugal has not sent a direct mail or letter with an invitation to public consultation on the NP 4406 standard to stakeholders identified in the stakeholders mapping.</p> <p>However, it should be noted that PEFC Portugal and IPQ communicated the public consultation via social media (LinkedIn and Facebook) with reach to more than 1500 stakeholders. The social media is an appropriate communication channel to stakeholders and has a similar effect as direct mailing although this tool cannot guarantee that all key and disadvantaged stakeholders have been contacted.</p> <p>PEFC Portugal also argues that an extensive communication was made at the beginning of the process when stakeholders were contacted by direct mailing and information about the standard setting process also described foreseen public consultation.</p>
(d) the enquiry draft is made publicly available,	Procedures	YES	<p>OR TC 145</p> <p>6.3 "In the case of a prDNP, the NSB is responsible for publicizing the public inquiry, ensuring that:</p> <ul style="list-style-type: none"> - It is published on the website of the SSB or other associations concerned;" <p>Compliance: Conformity</p> <p>Justification:</p> <p>OR TC 145 requires the standard to be published at least at the SSB website.</p>
	Process	YES	<p>The announcement of the public consultation that took place from 15 November 2021 to 14 January 2021 has been announced by the following means:</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>a) at the PEFC Portugal website on 15 November 2021^[34], b) at the NSB / IPQ website^[34], c) at the SSB / ICNF website on 3 December 2021^[31], d) at the PEFC Portugal LinkedIn profile^[35] e) at the NSB/ IPQ Newsletter^[36], f) at PEFC Portugal Facebook^[51].</p> <p>All the referenced websites also include a link to the NP 4406 standard that was submitted to the public consultation.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard was published and referenced in the announcement.</p>
(e) public consultation is for at least 60 days,	Procedures	YES	<p>OR TC 145</p> <p>6.3 "In the case of a prDNP, the NSB is responsible for publicizing the public inquiry, ensuring that:</p> <ul style="list-style-type: none"> - The public inquiry period lasts for the duration that the TC has decided and that appears in the report sent to the ONSB, and must never be less than 60 days;" <p>Compliance: Conformity</p> <p>Justification:</p> <p>OR TC 145 requires at least 60 days public consultation.</p>
	Process	YES	<p>The announcement of the public consultation that took place from 15 November 2021 to 14 January 2021^[31, 34, 35, 51].</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The public consultation lasted 60days.</p>
(f) all feedback is considered by the working group in an objective manner, and	Procedures	YES	<p>OR TC 145</p> <p>6.3: "At the end of the public inquiry period, and in view of the comments received, TC 145:</p> <ul style="list-style-type: none"> - If considers to be convenient, can invite the interested parties who made the comments, for their consideration in a meeting to be held for this purpose; - Decides whether the comments and eventual amendment proposals resulting from them are submitted to an objective assessment in a plenary meeting of TC 145, being able to be directly submitted to a vote or sent for a more in-depth analysis;" <p>Compliance: Conformity</p> <p>Justification:</p> <p>OR TC 145 requires consideration of comments from public consultation.</p>
	Process	YES	<p>All comments received from the public consultation were considered at the SC 2 meeting held on 8-9 February 2022^[18, 21].</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>^{37]}. Outcomes of the meeting were reported in minutes^[21] and also in a synopsis table of all received comments^[37].</p> <p>The comments were also considered at the TC 145 meeting held on 21 February 2022^[16, 24] where decision on formal approval of the draft NP 4406 was made.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>SC 2 and TC 145 considered comments received from public consultation.</p>
<p>(g) a synopsis of feedback is compiled for each material issue, including the outcome of considering the issue. The synopsis is made publicly available (e.g. on a website) and is sent to each stakeholder/party that gave feedback.</p> <p>NOTE For clarity the standardising body's synopsis may aggregate responses on material issues where there was similar feedback from different stakeholders. However, best practice would be to publish each piece of original feedback and the response, to allow each stakeholder to identify its own feedback.</p>	Procedures	NO	<p>OR TC 145</p> <p>6.3: "At the end of the public inquiry period, and in view of the comments received, TC 145:</p> <ul style="list-style-type: none"> - Prepares a new report containing the justification for the comments not included and the proposal to move from prDNP to DNP, or subject to a new public inquiry, if applicable." <p>"In the case of moving to the NP stage, the NSB, with the collaboration of TC 145, must prepare a document including the description of the standardization process developed, the compilation of all the comments received, the results obtained in the scope of the assessment and it publicly, for example on its website and may also be placed on websites of other associations to which the matter relates.</p> <p>RPNP 040/2010</p> <p>4.3: "Once the public inquiry period has expired, the comments received will be forwarded to the organism that coordinates the author CT, for its appreciation.</p> <p>The CT must prepare a new report (model DNOR03001) containing the justification for the comments not included and the proposal to change the prNP to NP, or subject to a new public inquiry, as the case may be.</p> <p>The CT, if it deems it convenient, may invite the entities that made the comments, for consideration at a meeting to be held for this purpose.</p> <p>PEFC PT GUIDE 1005</p> <p>7.5 "The response to stakeholders in view of their comments on an elaborate consultation, must follow the description in subsection 4.3 of RPNP 040/2010. However, if not all stakeholders participate in the meetings held at TC 145, PEFC Portugal may make available the decisions taken in TC 145 on the comments made, directly to the entities or publicly (e.g., website and/or social networks), provided that respecting data protection (GDPR).</p> <p>Compliance: Minor non-conformity</p> <p>Justification:</p> <p>The procedures (OR TC 145) require the synopsis on the comments and their consideration to be made available at the website. It requires to prepare a report on comments received during the public consultation and their justification. TC 145 shall than prepare a document on the standard setting process that also</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>includes compilation of comments received, result of their evaluation; and make this document publicly available.</p> <p>The procedures of the IPQ (NSB, 040/2010) that are binding to the NSB and TC 145 also allow the stakeholders commenting on the standard to be invited to the TC meeting considering the comments. The PEFC Portugal's procedures (PEFC PT GUIDE 1005) allow the report on the comments to be sent directly to stakeholders who commented the standard.</p> <p>The minor non-conformity is based on the fact that neither the NSB procedures (OR TC 145) nor the NSB procedures (040/2010) ensures that the "synopsis of received comments and their consideration" are sent directly to the stakeholders making comments. The PEFC Portugal procedures (PEFC PT GUIDE 1005) introduces this requirement with the verb "may" which does not make it compulsory and only gives it as an option "either to publish at the website / social media or to be sent directly".</p>
	Process	YES	<p>All the received comments were made by members of TC 145 and SC2. Those stakeholders participated in SC 2 and TC145 meetings and had access to synopsis on received comments and their consideration^[16, 18, 21, 24, 37].</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The comments and their consideration were available to stakeholders that made comments.</p>
6.5.2 For new standards the standardising body shall organise a second round of public consultation lasting at least 30 days.	Procedures	YES	<p>OR TC 145</p> <p>6.2 "Before the standard phase, the NSB, together with the PEFC national governing body, in order to ensure compliance with the international certification system requirements, shall promote, in collaboration with the members of CT 145 and, eventually, other parties interested parties, a pilot test to the new standardization document and the results obtained shall be considered by TC 145 (this pilot test is not applicable in case of revision, where there is already experience in the application of that document). In the event that changes are made to the standardization document, resulting from this pilot test, the result shall be subject to a new 30-day public consultation. This consultation should follow the same procedure as the prior public consultation of standardization documents".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>OR TC 145 requires that were a pilot test of to the new standardisation document results in changes to a piloted standard, the results shall be subject to a new 30 days public consultation. The approach meets the objective of the PEFC requirement.</p>
	Process	N/A	<p>Compliance: Not applicable</p> <p>Justification:</p> <p>The applicant has not conducted the second public consultation as it has revised an existing standard. The pilot test did not result in</p>

PEFC benchmark requirement	Assess. basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			material changes to the draft standard and did not require new public consultation as indicated in OR TC 145.
<p>6.6 The standardising body shall organise pilot testing of new standard(s) to assess the clarity, auditability and feasibility of the requirements. The working group shall consider the outcome of pilot testing.</p> <p>NOTE Pilot testing is not required for revision of an existing standard when experience from its usage can substitute for pilot testing.</p>	Procedures	YES	<p>OR TC 145</p> <p>6.2 “Before the standard phase, the NSB, together with the PEFC national governing body, in order to ensure compliance with the international certification system requirements, shall promote, in collaboration with the members of CT 145 and, eventually, other parties interested parties, a pilot test to the new standardization document and the results obtained shall be considered by TC 145 (this pilot test is not applicable in case of revision, where there is already experience in the application of that document)”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>OR TC 145 requires that a pilot test for a new standardisation document.</p>
	Process	YES	<p>The applicant has organised pilot testing of TOF requirements, a new element of the NP 4406 standard on 15 February 2022^[38, 39].</p> <p>The pilot test was conducted on the area managed by Municipality of Lousada (Lousada Environment-Sector of Nature Conservation and Environmental Education in partnership with VERDE-Association for Integrated Nature Conservation, co-manager of the Green Giants Project). The property is a member of a group certificate of TheUnimadeiras S.A., manager of the sustainable forest management certificate (APCER/2012/GFS.0005).</p> <p>The pilot test was conducted by APCER, the certification body, and the Ks solutions, coordinating body of the working group responsible for the development of the requirements of Trees Outside the Forest (GT5 of SC 2 / TC 145).</p> <p>The pilot test did not result in material changes to the NP 4406 standard.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The pilot testing took place and was conducted by personnel with sufficient qualification and competences. The sites of the pilot testing were also visited during the in-country visit, including interviews of personnel conducting the pilot test and personnel present.</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.	Procedures	YES	<p>OR TC 145</p> <p>6.2 “The decision to approve standardization documents is the responsibility of the NSB, on the proposal of the SSB, after the approval of the prDNP, in the plenary of TC 145, carried out by consensus”.</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>6.3 TC 145: "Prepares a new report containing the justification for the comments not included and the proposal to move from prDNP to DNP, or subject to a new public inquiry, if applicable".</p> <p>"Once this process has been completed and based on the approval report, the NSB will decide whether the prNP meets the conditions for moving to the NP stage or whether it should be submitted to a new public inquiry".</p> <p>6.4: "For the Portuguese Standard, after having ensured that all applicable procedures have been complied with, the NSB approves, ratifies and edits the documents that become part of the Portuguese normative collection, through their official publication within the deadlines established for that purpose."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>OR TC 145 indicates that the standard is approved by the NSB based on consensus reached at the TC 145 level.</p>
	Process	YES	<p>TC 145 reached consensus on the draft NP 4406 standard at its meeting No 100 and then No ¹⁰¹[23, 29]. NSB / IPQ formally approved the NP 4406 standard on 10 May 2022^[40] and published it on 16 May 2022.</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.	Procedures	YES	<p>OR TC 145</p> <p>6.4 "In the case of Portuguese Standard 4406 or other normative documents produced with the aim of obtaining PEFC recognition, the publication will be carried out on the websites and other places of the national and international PEFC. The standard will be publicly accessible and free of charge within 14 days of the TC approval date."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>OR TC 145 satisfies the PEFC requirement.</p>
	Process	YES	<p>The NP 4406 standard was published at the IPQ website on 16 May 2022^[44]. The publication was announced by PEFC Portugal^[44], members of TC 145 were informed about the publication by email^[42].</p> <p>The NP 4406 is available at the IPQ website for a fee of 52 EUR. However, it is also available at the PEFC Council website, free of charge^[43].</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The formally approved standard was published on 16 May 2022, 6 days after its formal approval. The fee for the standard is defined</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			by the standardisation body and as such is in compliance with the PEFC requirement.
7.2.2 Standard(s) shall include:			
(a) identification and contact information for the standardising body,	Procedures	YES	<p>OR TC 145</p> <p>6.4 "The standard must contain:</p> <ul style="list-style-type: none"> - The official language of the standard; - A note stating that in the presence of inconsistencies in the translation, the English version, as submitted for recognition by the PEFC, will be the reference standard; - The approval date and the date of the next periodic evaluation." <p>"For the Portuguese Standard, after having ensured that all applicable procedures have been complied with, the NSB approves, ratifies and edits the documents that become part of the Portuguese normative collection, through their official publication within the deadlines established for that purpose".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>OR TC 145 does not include an explicit text requiring that identification of the standardisation body shall be displayed at the standard. However, as it indicates that the standard becomes a part of the official Portuguese normative collection, it becomes implicit as all NP standards include identification and contact details of IPQ.</p>
	Process	YES	<p>NP 4406</p> <p>NP 4406 (English version submitted for the PEFC endorsement) includes reference to PEFC Portugal, its address and contact details.</p> <p>NP 4406, its formal Portuguese version that was approved by the IPQ includes reference to the IPQ, its address and contact details^[52].</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>NP 4406 (English version submitted for the PEFC endorsement) includes reference to PEFC Portugal, its address and contact details.</p> <p>NP 4406, its formal Portuguese version that was approved by the IPQ includes reference to the IPQ, its address and contact details.</p> <p>The formal version of the standard is the Portuguese version and NP 4406 has been developed and approved by the IPQ. The IPQ is considered as the standardisation body and its name is presented at the Portuguese official version.</p> <p>Observation</p> <p>PEFC Portugal presented for the PEFC endorsement a translated version of NP 4406. However, the front page of the NP 4406</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>standard (in Portuguese language)^[52] with identification of the IPQ (in Portuguese language)^[52] as the standardisation body has been replaced by the PEFC Portugal by its own design and reference to PEFC Portugal.</p> <p>However, it should be noted that the conformity assessment bodies, both certification and accreditation bodies will only make reference to official Portuguese standard as adopted and published by the IPQ. The role of the PEFC Portugal's English version will solely serve the purpose of the PEFC endorsement.</p>
(b) official language of the standard,	Procedures	YES	<p>OR TC 145</p> <p>6.4 "The standard must contain:</p> <ul style="list-style-type: none"> - The official language of the standard; - A note stating that in the presence of inconsistencies in the translation, the English version, as submitted for recognition by the PEFC, will be the reference standard; - The approval date and the date of the next periodic evaluation." <p>Justification:</p> <p>OR TC 145 satisfies the PEFC requirement.</p>
	Process	YES	<p>NP 4406</p> <p>NP 4406 (English version submitted for the PEFC endorsement) does not include a statement on the official language of the standard.</p> <p>NP 4406 (Portuguese official version)^[52] has been published by the IPQ in Portuguese and this is the only official language of the standard.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>NP 4406 has been published as a part of the Portuguese normative collection that is by default published in the Portuguese language. This is clearly indicated in RPNP 040/2010, ch. 4.5.</p>
(c) a note that when there is inconsistency between versions, the English version of the standard as endorsed by the PEFC Council is the reference.	Procedures	YES	<p>OR TC 145</p> <p>6.4 "The standard must contain:</p> <ul style="list-style-type: none"> - The official language of the standard; - A note stating that in the presence of inconsistencies in the translation, the English version, as submitted for recognition by the PEFC, will be the reference standard; - The approval date and the date of the next periodic evaluation." <p>Compliance: Conformity</p> <p>Justification:</p> <p>OR TC 145 satisfies the PEFC requirement.</p>
	Process	NO	<p>NP 4406 (English version submitted for the PEFC endorsement) does not include a statement that the English version is decisive.</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>Compliance: Minor non-conformity</p> <p>Justification:</p> <p>NP 4406 (English version submitted for the PEFC endorsement) does not include a statement that the English version is decisive.</p> <p>PEFC Portugal presented for the PEFC endorsement a translated version of NP 4406. However, the front page of the NP 4406 standard (in Portuguese language)^[52] with identification of the IPQ (in Portuguese language)^[52] as the standardisation and the IPQ's own copyright claim has been replaced by the PEFC Portugal by its own design and reference to PEFC Portugal.</p> <p>The only official version the standard is the Portuguese version, officially published by the IPQ and included in the IPQ's Portuguese normative collection. The role of the PEFC Portugal's English version will solely serve the purpose of the PEFC endorsement.</p> <p>It should be noted that the conformity assessment bodies, both certification and accreditation bodies will only make reference to the official Portuguese standard as adopted and published by the IPQ. Those bodies will neither consider the English (PEFC Portugal's) version of the standard in the evaluation nor in case of resolving any apparent complaint relating to discrepancies between the Portuguese and English version. This position has been confirmed by both IPQ and IPAC (the accreditation body) during face-to-face interviews during the in-country visit.</p> <p>It should be noted that the IPQ's procedures allow publication of English versions of its standards based on requests of the NSB, respectively the T (RPNP 040/2010). However, it is likely that this decision would have an impact on possibility to make the standard freely available at the PEFC Portugal website.</p> <p><i>"4.5 Approval of Portuguese standards</i></p> <p><i>After having ensured that all applicable procedures have been followed, the NSB approves and homologates the aNP or prNP as NP that become part of the Portuguese normative collection.</i></p> <p><i>4.6 English version of Portuguese standards</i></p> <p><i>English versions of Portuguese standards must be prepared, whenever the CT deems relevant and important for the development of normative work at the level European or international, or when the market so requires. These English versions are approved by the NSB and integrated into the Portuguese normative collection, maintaining the year of the original normative document".</i></p>
<p>(d) The approval date and the date of next periodic review</p> <p>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.</p>	Procedures	YES	<p>OR TC 145</p> <p>6.4 "The standard must contain:</p> <ul style="list-style-type: none"> - The official language of the standard; - A note stating that in the presence of inconsistencies in the translation, the English version, as submitted for recognition by the PEFC, will be the reference standard; - The approval date and the date of the next periodic evaluation." <p>Compliance: Conformity</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			Justification: OR TC 145 satisfies the PEFC requirement.
	Process	NO	Approval date The English version of the NP 4406 standard includes the approval date of the standard (10.5.2022). The Portuguese version of the NP 4406 standard includes the publication date of 16.5.2022 ^[51] . Review date The English version of the NP 4406 standard includes “NGB revision by date:” 27.5.2027. The Portuguese version of the NP 4406 standard does not include the “review date”. Compliance: Minor-non-conformity Justification: Approval date The English version of the NP 4406 standard includes an approval date (10.5.2022) while the formal Portuguese version includes “publication date” (16.5.2022). Both dates are correct as the approval date is consistent with a formal protocol of the NP 4406 approval ^[40] and the publication date is consistent with the date of entry into force as presented at the IPQ website where the standard is published ^[44] . Dis slight discrepancy has neither impact on the implementation of the standard nor on future revision of the standard. It is understood that PEFC Portugal placed the approval date following the PEFC requirements of PEFC ST 1001:2017 while IPQ is following the ISO practice of displaying the publication date. Review date The English version of the NP 4406 standard makes reference to the “NGB revision by date” The English version of the NP 4406 standard refers to a five years cycle between the approval of the standard and the next revision. This is consistent with the maximum five years cycle between the approval and review of the standard required by PEFC ST 1001:2017. The minor non-conformity has been assigned based on the fact that the term “NGB revision by date” is rather unclear and ambiguous as it is not clear whether the standard revision will start at this date or will be completed by this date. In addition, the PEFC requirement refers to the “review date” that is interpreted as a period when the “review process starts” and is then followed by the “revision” process. It is evident that the cycle referenced by PEFC Portugal will be significantly shorter than one requested by the PEFC Council.
7.2.3 Printed copies shall be made available upon request at a price that covers no more	Processes	YES	OR TC 145 6.4 “The NSB, as the holder of the collective intellectual property of Portuguese normative documents, makes these documents

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
than administrative costs (if any)			<p>available to the public according to commercial acquisition conditions established by the same, without prejudice to the establishment of bilateral agreements that are in the interest of the parties involved."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>OR TC 145 satisfies the PEFC requirement.</p>
	Process	YES	<p>The NP 4406 standard is available at the IPQ website^[44] for a fee of 52.50 EUR.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard is a part of the official normative collection of standard governed by IPQ (the formal National Standardisation Body). As such, all the NP standards are available at price that covers administrative costs and some parts of costs relating to the governance of the Portuguese national normative collection.</p>
7.2.4 The standardising body shall make the development report (refer to PEFC GD 1007) publicly available	Procedures	YES	<p>OR TC 145</p> <p>6.4 "The NSB shall make the development report publicly accessible (as described in PEFC GD 1007)."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>OR TC 145 requires the development report to be prepared and published.</p>
	Process	YES	<p>The Development report has been published at the PEFC Portugal website^[53].</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Development report has been published at the PEFC Portugal website^[53].</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	Procedures	YES	<p>OR TC 145</p> <p>8. "The standards produced within the scope of this TC shall be subject to periodic evaluation in periods that do not exceed 5 years from the date of approval of the respective normative documents."</p> <p>"At the beginning of a periodic assessment, the TC shall carry out a verification of the standard based on the following criteria:</p> <ul style="list-style-type: none"> - Experience acquired with the application of the standard; - Latest available scientific knowledge and emerging issues;

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
necessary, a stakeholder consultation shall be organised to obtain further feedback and input.			<ul style="list-style-type: none"> - Gap analysis with reference documents of the PEFC international certification systems as well as legislation, regulations and other relevant regulations; - Principle of continuous improvement". <p>Compliance: Conformity</p> <p>Justification:</p> <p>OR TC 145 satisfies the requirement.</p>
	Process	YES	<p>The NP 4406:2014 was approved on 9 July 2014. This would mean that the standard should start its review process in July 2019.</p> <p>TC 145 started the review process at its meeting held on 4 April 2019^[6].</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The review 2019 started before the five-years cycle.</p>
8.2.1 The standardising body shall establish and maintain a permanent mechanism for collecting and recording feedback on a standard. This mechanism shall be accessible on the website of the standardising body and/or PEFC National Governing Body with clear directions for providing feedback.	Procedures	YES	<p>OR TC 145</p> <p>7.1 "The SSB shall establish and maintain a permanent mechanism for collecting and recording comments on standardization documents. This mechanism should be accessible on the SSB website or the PEFC website and with clear instructions for submitting comments.</p> <p>Note: Comments are considered to be all comments received in the various available channels, including meetings, training actions, etc. and must be recorded and considered within the scope of the review processes".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>OR TC 145 satisfies the requirement.</p>
NOTE Feedback can be sent in various formats: comments, requests for clarification and/or interpretation, complaints, etc.	Process	YES	<p>PEFC Portugal as well as ICNF have at their websites description of TC 145^[45, 46]. TC 145 is established as a permanent body that allows consideration of comments and feedback received in between periodic revisions.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>TC 145 and its permanent nature provides for mechanism of consideration of comments and feedback in between the periodic revisions.</p>
8.2.2 All feedback received through all channels, including meetings, training courses, etc. shall be recorded and considered.	Procedures	YES	<p>OR TC 145</p> <p>7.1 "The SSB shall establish and maintain a permanent mechanism for collecting and recording comments on standardization documents. This mechanism should be accessible on the SSB website or the PEFC website and with clear instructions for submitting comments.</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>Note: Comments are considered to be all comments received in the various available channels, including meetings, training actions, etc. and must be recorded and considered within the scope of the review processes".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>OR TC 145 satisfies the requirement.</p>
	Process	YES	<p>Compliance: Conformity</p> <p>Justification:</p> <p>TC 145 is based on work programme agreed by members of the Committee. Outcomes of the TC 145 considerations are recorded in minutes and accessible stakeholders.</p>
8.3.1 At the start of a review, the standardising body shall evaluate the standard against appropriate PEFC International standards, national laws and regulations, and other relevant standards to identify potential gaps in the standard.	Procedures	YES	<p>OR TC 145</p> <p>8 "At the beginning of a periodic assessment, the TC shall carry out a verification of the standard based on the following criteria:</p> <ul style="list-style-type: none"> - Experience acquired with the application of the standard; - Latest available scientific knowledge and emerging issues; - Gap analysis with reference documents of the PEFC international certification systems as well as legislation, regulations and other relevant regulations; - Principle of continuous improvement". <p>Compliance: Conformity</p> <p>Justification:</p> <p>OR TC 145 satisfies the requirement.</p>
	Process	YES	<p>PEFC Portugal conducted three GAP analysis focused on group certification, ToF and SFM^[47, 48, 49]. Those analysis include evaluation of PEFC benchmark documents (PEFC ST 1003:2018, PEFC ST 1002:2018) as well as Portuguese legislation changes.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PEFC Portugal conducted GAP analysis.</p>
8.3.2 The standardising body shall consider the latest scientific knowledge, research and relevant emerging issues.	Procedures	YES	<p>OR TC 145</p> <p>Ch. 7.1 and ch. 4.1 lists the categories of the members that are within TC145. This list includes category E, where are representatives of universities, technological centers, etc., beside all entities with knowledge and experience on the implementation of SFM standards (e.g. categories A, A0, A1, F)</p> <p>8 "At the beginning of a periodic assessment, the TC shall carry out a verification of the standard based on the following criteria:</p> <ul style="list-style-type: none"> - Latest available scientific knowledge and emerging issues";

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			Compliance: Conformity Justification: The composition of TC 145 ensures that the latest scientific knowledge feeds into the review and revision process.
	Process	YES	TC 145 includes representatives of representatives of universities, technological centers, etc. Those members along with other members of TC 145 ensure that that the latest scientific knowledge feeds into the review and revision process. Compliance: Conformity Justification: The composition of TC 145 ensures that the latest scientific knowledge feeds into the review and revision process.
8.4.1 Where the feedback and the gap analysis do not identify a need to revise the standard, the standardising body shall organise stakeholder consultation to determine whether stakeholders see a need for revising the standard. The standardising body shall include the gap analysis in the stakeholder consultation.	Procedures	YES	OR TC 145 8.1 "If the result of the periodic assessment indicates the absence of a need for a conventional review, the SSB shall organize a consultation process with the objective of ascertaining whether interested parties see a need to initiate a review process. The SSB shall include the results of the gap analysis in the consultation." Compliance: Conformity Justification: OR TC 145 requires to carry out public consultation where the gap analysis do not identify the need for revision.
	Process	N/A	TC 145 decided to launch a formal revision process.
8.4.2 At the start of a review, the standardising body shall update the stakeholder identification mapping (refer to clause 6.2).	Procedures	YES	OR TC 145 8.1 "The SSB shall organize: a) A public consultation for a minimum period of 30 days, in accordance with the requirements described in point 6.4;". Compliance: Conformity Justification: OR TC 145 satisfies the PEFC requirement. The stakeholder mapping is referenced in chapter 6.4.
	Process	N/A	TC 145 decided to launch a formal revision process.
8.4.3 The standardising body shall organise:			
(a) a public consultation period of at least 30 days (following the	Procedures	YES	OR TC 145 8.1 "The SSB shall organize:

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
requirements of clause 6.5.1) and/or,			<p>a) A public consultation for a minimum period of 30 days, in accordance with the requirements described in point 6.4;".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>OR TC 145 satisfies the PEFC requirement.</p>
	Process	N/A	TC 145 decided to launch a formal revision process.
(b) stakeholder meetings.	Procedures	YES	<p>OR TC 145</p> <p>8.1 "The SSB shall organize: ...</p> <p>b) Meeting of interested parties".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>OR TC 145 satisfies the PEFC requirement.</p>
	Process	N/A	TC 145 decided to launch a formal revision process.
8.4.4 The standardising body shall announce the review in a timely manner (refer to 6.3).	Procedures	YES	<p>OR TC 145</p> <p>8.1 "Otherwise, the review must follow the same methodology as the development of a new standard".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>OR TC 145 satisfies the PEFC requirement as it refers to procedures for regular development of standards.</p>
	Process	N/A	TC 145 decided to launch a formal revision process.
8.5.1 Based on the feedback received during the period of a standard's implementation, the outcome of the gap analysis and the consultations, the standardising body shall decide whether to reaffirm the standard or whether a revision of the standard is necessary.	Procedures	YES	<p>OR TC 145</p> <p>8.1 "Based on the results of the consultation, the TC shall decide in a plenary meeting to maintain the standard and therefore propose its approval or initiate a review process.</p> <p>If the TC decides to maintain the standard, it must justify the decision and make it publicly accessible."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>OR TC 145 satisfies the PEFC requirement.</p>
	Process	YES	<p>Compliance: Conformity</p> <p>Justification:</p> <p>In April 2019, TC 145 decided on conventional revision of the NP 4406 standard^[6].</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
8.5.2 The decision shall be made at the highest decision-making level of the standardising body	Procedures	YES	<p>OR TC 145</p> <p>8.1 “Based on the results of the consultation, the TC shall decide in a plenary meeting to maintain the standard and therefore propose its approval or initiate a review process.</p> <p>If the TC decides to maintain the standard, it must justify the decision and make it publicly accessible.”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The decision is to be taken by TC 145. Although TC 145 is not the highest decision-making body within SSB, it is well placed to make such a decision. In addition, any announcement of the standard revision shall be made by the SSB.</p>
	Process	YES	<p>Compliance: Conformity</p> <p>Justification:</p> <p>In April 2019, TC 145 decided on conventional revision of the NP 4406 standard^[6].</p>
8.5.3 Where the decision is to reaffirm a standard, the standardising body shall provide a justification for the decision and make the justification publicly available.	Procedures	YES	<p>OR TC 145</p> <p>8.1 “Based on the results of the consultation, the TC shall decide in a plenary meeting to maintain the standard and therefore propose its approval or initiate a review process.</p> <p>If the TC decides to maintain the standard, it must justify the decision and make it publicly accessible.”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>OR TC 145 satisfies the PEFC requirement.</p>
	Process	N/A	TC 145 decided to launch a formal revision process.
8.5.4 Where the decision is to revise the standard, the standardising body shall specify the type of revision (normal or editorial revision).	Procedures	YES	<p>OR TC 145</p> <p>8.2 “The review can assume the following typologies: Conventional, editorial and time-critical revision”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>OR TC 145 satisfies the PEFC requirement.</p>
	Process	YES	In April 2019, TC 145 decided on conventional revision of the NP 4406 standard ^[6] .
Revision of standards			

PEFC benchmark requirement	Assess. basis	YES /NO	Reference to system documentation (including quotation of relevant text)
<p>9.1 Procedures for revision of standard(s)/normative document(s) shall conform to those stated in section 6.</p> <p>A normal revision can occur at the periodic review, or between periodic reviews, but does not include editorial revisions and time-critical revisions.</p>	Procedures	YES	<p>OR TC 145</p> <p>8.2 “Conventional revision: this review shall follow a methodology identical to that of the elaboration of a new standard(s)/normative document(s), as described in this document. A conventional revision can occur at the periodic review, or between periodic reviews, but does not include editorial revisions and timecritical revisions”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>OR TC 145 satisfies the PEFC requirement.</p> <p>It should be noted that OR TC 145 uses the term “review” and “revision” for the same purpose. For the “review” in PEFC ST 1001 term, it uses “periodic evaluation”.</p>
	Process	YES	In April 2019, TC 145 decided on conventional revision of the NP 4406 standard ^[6] .
<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>	Procedures	YES	<p>OR TC 145</p> <p>8.2 “Editorial revision: editorial revisions can be made without triggering the conventional revision process. The TC 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>OR TC 145 satisfies the PEFC requirement.</p>
	Process	N/A	In April 2019, TC 145 decided on conventional revision of the NP 4406 standard ^[6] .
<p>9.3.1 A time-critical revision is a revision between two periodic reviews using a fast-track process.</p>	Procedures	YES	<p>OR TC 145</p> <p>8.2 “Time -critical revision: this review takes place during the period between conventional reviews using an expedited process. This review can only take place in the following circumstances:</p> <ul style="list-style-type: none"> - Change in national laws and regulations affecting compliance with PEFC International requirements, - Instruction by PEFC International to comply with specific or new PEFC requirements within a timescale that is too short for a normal revision”. <p>Compliance: Conformity</p> <p>Justification:</p> <p>OR TC 145 satisfies the PEFC requirement.</p>
	Process	N/A	In April 2019, TC 145 decided on conventional revision of the NP 4406 standard ^[6] .
9.3.2 A time-critical revision can be conducted only in the following situations:			

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
(a) Change in national laws and regulations affecting compliance with PEFC International requirements	Procedures	YES	<p>OR TC 145</p> <p>8.2 "Time -critical revision: this review takes place during the period between conventional reviews using an expedited process. This review can only take place in the following circumstances:</p> <ul style="list-style-type: none"> - Change in national laws and regulations affecting compliance with PEFC International requirements, - Instruction by PEFC International to comply with specific or new PEFC requirements within a timescale that is too short for a normal revision". <p>Compliance: Conformity</p> <p>Justification:</p> <p>OR TC 145 satisfies the PEFC requirement.</p>
	Process	N/A	In April 2019, TC 145 decided on conventional revision of the NP 4406 standard ^[6] .
(b) Instruction by PEFC International to comply with specific or new PEFC requirements within a timescale that is too short for a normal revision.	Procedures	YES	<p>OR TC 145</p> <p>8.2 "Time -critical revision: this review takes place during the period between conventional reviews using an expedited process. This review can only take place in the following circumstances:</p> <ul style="list-style-type: none"> - Change in national laws and regulations affecting compliance with PEFC International requirements, - Instruction by PEFC International to comply with specific or new PEFC requirements within a timescale that is too short for a normal revision". <p>Compliance: Conformity</p> <p>Justification:</p> <p>OR TC 145 satisfies the PEFC requirement.</p>
	Process	N/A	In April 2019, TC 145 decided on conventional revision of the NP 4406 standard ^[6] .
9.3.3 The time-critical revision shall follow these steps:			
(a) The standardising body shall draft the revised standard,	Procedures	YES	<p>OR TC 145</p> <p>8.2 "The time-critical revision shall follow these steps:</p> <ul style="list-style-type: none"> - TC shall draft the revised standard. TC may consult stakeholders, but it is not mandatory; - The revised document shall be submitted to a vote in a plenary meeting, following the voting requirements for DNP; - TC shall explain the justification for the urgent change(s) and make the justification publicly available." <p>Compliance: Conformity</p> <p>Justification:</p>

PEFC benchmark requirement	Assessment basis	YES/NO	Reference to system documentation (including quotation of relevant text)
			OR TC 145 satisfies the PEFC requirement.
	Process	N/A	In April 2019, TC 145 decided on conventional revision of the NP 4406 standard ^[6] .
(b) The standardising body may consult stakeholders, but it is not mandatory,	Procedures	YES	OR TC 145 8.2 "The time-critical revision shall follow these steps: - TC shall draft the revised standard. TC may consult stakeholders, but it is not mandatory; - The revised document shall be submitted to a vote in a plenary meeting, following the voting requirements for DNP; - TC shall explain the justification for the urgent change(s) and make the justification publicly available." Compliance: Conformity Justification: OR TC 145 satisfies the PEFC requirement.
	Process	N/A	In April 2019, TC 145 decided on conventional revision of the NP 4406 standard ^[6] .
(c) The revised standard shall be approved formally at the highest appropriate decision-making level of the standardising body,	Procedures	YES	OR TC 145 8.2 "The time-critical revision shall follow these steps: - TC shall draft the revised standard. TC may consult stakeholders, but it is not mandatory; - The revised document shall be submitted to a vote in a plenary meeting, following the voting requirements for DNP; - TC shall explain the justification for the urgent change(s) and make the justification publicly available." Compliance: Conformity Justification: OR TC 145 satisfies the PEFC requirement.
	Process	N/A	In April 2019, TC 145 decided on conventional revision of the NP 4406 standard ^[6] .
(d) The standardising body shall explain the justification for the urgent change(s) and make the justification publicly available.	Procedures	YES	OR TC 145 8.2 "The time-critical revision shall follow these steps: - TC shall draft the revised standard. TC may consult stakeholders, but it is not mandatory; - The revised document shall be submitted to a vote in a plenary meeting, following the voting requirements for DNP; - TC shall explain the justification for the urgent change(s) and make the justification publicly available." Compliance: Conformity

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			Justification: OR TC 145 satisfies the PEFC requirement.
	Process	N/A	In April 2019, TC 145 decided on conventional revision of the NP 4406 standard ^[6] .
9.4.1 A revision shall define the application date and transition period of the revised standard(s)/normative document(s).	Procedures	YES	OR TC 145 8.3 "The revision shall define the application date and transition period of the revised standard." Compliance: Conformity Justification: OR TC 145 satisfies the PEFC requirement.
	Process	YES	PEFC PT 1001 The application and transition dates are defined in PEFC PT 1001, chapter 5.2: "The date of application of the revised NP 4406 begins one day after the publication of the official publication list ONN-IPQ. The transition period between standards should not exceed one year. During the transition period both standards will coexist. This transition period aims to enable organizations, which intend to initiate, organize and implement certification, to implement the standard through training and awareness and ensure the period of verification of compliance of NP 4406 with the PEFC Council criteria with a view to maintaining the if recognition". Justification: PEFC PT 1001 includes both, the application as well as transition dates.
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	OR TC 145 8.3 "The application date shall not exceed one year after the publication of the standard, to allow time for the endorsement of the revised standard, introduction of change(s), information dissemination and training. The transition period shall not exceed a period of one year, except in exceptional circumstances where the implementation of the new document requires a longer period of time, which must be duly justified". Compliance: Conformity Justification: OR TC 145 satisfies the PEFC requirement.
	Process	YES	PEFC PT 1001 The application and transition dates are defined in PEFC PT 1001, chapter 5.2:

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>"The date of application of the revised NP 4406 begins one day after the publication of the official publication list ONN-IPQ. The transition period between standards should not exceed one year.</p> <p>During the transition period both standards will coexist. This transition period aims to enable organizations, which intend to initiate, organize and implement certification, to implement the standard through training and awareness and ensure the period of verification of compliance of NP 4406 with the PEFC Council criteria with a view to maintaining the if recognition".</p> <p>Justification:</p> <p>PEFC PT 1001 includes both, the application as well as transition dates. Both dates comply with the PEFC requirement.</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>OR TC 145</p> <p>8.3 "The application date shall not exceed one year after the publication of the standard, to allow time for the endorsement of the revised standard, introduction of change(s), information dissemination and training.</p> <p>The transition period shall not exceed a period of one year, except in exceptional circumstances where the implementation of the new document requires a longer period of time, which must be duly justified".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>OR TC 145 satisfies the PEFC requirement.</p>
	Process	YES	<p>PEFC PT 1001</p> <p>The application and transition dates are defined in PEFC PT 1001, chapter 5.2:</p> <p>"The date of application of the revised NP 4406 begins one day after the publication of the official publication list ONN-IPQ. The transition period between standards should not exceed one year.</p> <p>During the transition period both standards will coexist. This transition period aims to enable organizations, which intend to initiate, organize and implement certification, to implement the standard through training and awareness and ensure the period of verification of compliance of NP 4406 with the PEFC Council criteria with a view to maintaining the if recognition".</p> <p>Justification:</p> <p>PEFC PT 1001 includes both, the application as well as transition dates. Both dates comply with the PEFC requirement.</p>

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	YES	<p>NP 4406</p> <p>Group organisation's external and internal relevant issues shall be determined. A general framework for the group organisation shall be determined:</p> <p>a) regional groups: group of forest owners/managers defined by regional borders</p> <p>Sustainable forest management regional units' boundaries correspond to the NUTS administrative division. These initiatives shall at least correspond to NUTS III, and may be aggregated into larger-scale territorial units.</p> <p>The aggregation should take into account the specificities that influence the management system (egg soil and climate conditions, forest composition, PROF, etc.).</p> <p>b) other groups or;</p> <p>The limit of the group certified area is set by the declared group members' forest areas.</p> <p>c) at national level there are no other circumstances than those contemplated in a) and b).</p> <p>Compliance: Not applicable</p> <p>Justification:</p> <p>The standard defines regional group as one application module where NUTS administrative borders are referenced as geographical boundaries of the regional group certification.</p>
b) other groups and/or	YES	<p>NP 4406</p> <p>Group organisation's external and internal relevant issues shall be determined. A general framework for the group organisation shall be determined:...</p> <p>b) other groups or;</p> <p>The limit of the group certified area is set by the declared group members' forest areas.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard allows "other groups" where the certified area is defined by participating group members.</p>
c) whether there are any other specific circumstances which influence the implementation of the group management system.	YES	<p>NP 4406</p> <p>Group organisation's external and internal relevant issues shall be determined. A general framework for the group organisation shall be determined:...</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>c) at national level there are no other circumstances than those contemplated in a) and b).</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard does not define any specific circumstances influencing implementation of the group management system.</p>
4.2 Understanding the needs and expectations of affected stakeholders		
4.2.1 The standard requires that the group organisation shall identify:		
a) the affected stakeholders that are relevant for the group management system and	YES	<p>NP 4406</p> <p>B.4.2.1 "The group organisation shall identify:</p> <p>a) the affected stakeholders that are relevant for the group management system and</p> <p>b) the relevant expectations of these affected stakeholders".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard requires to identify affected stakeholders (B4.2.1).</p>
b) the relevant expectations of these affected stakeholders.	YES	<p>NP 4406</p> <p>B.4.2.1 "The group organisation shall identify:</p> <p>a) the affected stakeholders that are relevant for the group management system and</p> <p>b) the relevant expectations of these affected stakeholders".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard requires to identify relevant expectations of affected stakeholders (B4.2.1).</p>
4.3 Determining the scope of the group management system		
4.3.1 The standard shall provide definitions relating to the following terms, which are in conformity with the definitions of those terms presented in chapter 3:		
a) the group organisation and the elements of the group organisation (group entity and participant),	YES	<p>NP 4406</p> <p>B.4.3.1 "Based on the definitions in Section 3, the group organisation should consider for its system' scope:</p> <p>a) the group organisation and it's elements (group entity and participant(s));</p> <p>b) the certified area;</p> <p>c) the group forest management certificate; and</p> <p>d) the document confirming participation in group certification."</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>3.1.3 participant</p> <p>A forest owner/manager (3.1.45) covered by the group forest management certificate (3.1.15), or regional who has the ability to implement the requirements of the sustainable forest management (3.1.29) standard in a certified area (3.1.6).</p> <p>NOTE: The term “ability to implement the requirements of the sustainable forest management standard” (3.1.29) requires the entity to have a long-term legal right, tenure right or traditional or customary tenure rights to manage the forest (3.1.27).</p> <p>3.1.38 group organisation</p> <p>A group of participants represented by the group entity (3.1.23) with the objective of implementing the sustainable forest management (3.1.29) standard and its certification. The term “group organisation” is equivalent to “regional organisation” if the group is defined by regional boundaries or other terms chosen by the forest management certification (3.1.12.) scheme and complying with the content of this definition.</p> <p>3.1.23 group entity</p> <p>A legal entity that represents the participants, with overall responsibility for ensuring the conformity of forest management in the certified area (3.1.6) to the sustainable forest management (3.1.29) standard and other applicable requirements of the forest management certification (3.1.12) system. For this purpose the group entity is using a group management system.</p> <p>NOTE: The structure of the group entity should follow the operations, number of participants and other basic conditions for the group organisation (3.1.38). It may be represented by one person.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The definitions are compatible with those defined in PEFC ST 1002:2018.</p>
b) the certified area,	YES	<p>NP 4406</p> <p>3.1.6 certified area</p> <p>Area within the scope of the certificate, belonging to one or more entities, continuously or not, and covered by a sustainable forest management system (3.1.29) certified in accordance with this standard. Includes forest areas (3.1.24) and Trees Outside Forests (3.1.8).</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The definition is compatible with the one defined in PEFC ST 1002:2018. The certified area is linked to the scope of the certificate (including the group forest management certificate) and to sustainable forest management system and its certification. This ensures that the certified area</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		covers the “group organisation”, in particular cumulative sum of participating forest owners.
c) the group certificate and	YES	<p>NP 4406</p> <p>3.1.15 group forest management certificate</p> <p>A document confirming that the group organisation (3.1.38) complies with the requirements of a sustainable forest management (3.1.29) standard and other applicable requirements of the forest management certification (3.1.12) system.</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>NP 4406</p> <p>3.1.22 “document confirming participation in group forest management certification</p> <p>A document issued to a participant (3.1.3) that refers to the group forest management certificate (3.1.15) and that confirms the participant (3.1.3) as being covered by the scope of the group forest management certification (3.1.13).</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>NP4406</p> <p>B.4.3.1.1 “For the establishment of the group management system scope the boundaries and applicability of the group management system shall be identified (products, species, inclusions and requirements exclusions)”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document requires to define the scope of the group management system (B.4.3.1.1).</p>
4.3.3 The standard shall define which requirements of the sustainable forest management standard may be fulfilled on group level.	YES	<p>NP4406</p> <p>B.4.3.1 Based on the definitions in Section 3, the group organisation should consider for its system’ scope:...”</p> <p>B.4.3.1.3 “Shall be defined which requirements of this standard may be fulfilled on group level.”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The requirements for the group certification in an Annex B of the Standard. An interpretation is given for each</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>requirement of the core part and clearly indicates whether the requirement shall be met by the group organisation or the requirements the requirement of the core part shall be applied without any modification (e.g. "Apply Subsection 6.2.1 of this standard"). Therefore, the standard makes clear which requirements shall be met at the group level and which shall be applied as described in the core part.</p> <p>Chapter 4.3.1.3 then indicates that as a part of the definition of the scope of the management system, it shall be defined which requirements can be applied at the group level. Following the structure of the standard, the definition of the scope and boundaries of the management system is a responsibility of the "group organisation" ("B.4.3.1 Based on the definitions in Section 3, the group organisation should consider for its system' scope:...").</p>
4.3.4 The standard requires that the scope shall be made available as documented information.	YES	<p>NP4406</p> <p>B.4.3.1.2 "The scope shall be made available as documented information".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard requires the scope to be documented as "documented information" (B.4.3.1.2).</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>NP 4406:</p> <p>B.5.3.2.1 "Functions and responsibilities of the group entity</p> <p>The following functions and responsibilities of the group entity shall be specified:...</p> <p>k) to operate an internal monitoring programme that provides the evaluation of the participants' conformity with the certification requirements;</p> <p>l) to operate an annual internal audit programme covering both group members and group entity".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard establishes internal monitoring and internal audit programme that is focused on participants' compliance with the standard.</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>NP 4406:</p> <p>B.4.4.6 "If the group entity acts as a trader of forest based material not covered by group certificate the group entity shall put in place a certified PEFC chain of custody system."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document requires the group entity to obtain PEFC CoC certification if it trades forest based material that is not covered by the group certification.</p>
5. Leadership		

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
5.1 Organisational roles, responsibilities and authorities		
5.1.1 Functions and responsibilities of the group entity		
The standard requires that the following functions and responsibilities of the group entity shall be specified:		
a) to implement and maintain an effective management system covering all participants of the group;	YES	<p>NP 4406:</p> <p>B.5.3.2.1 "Functions and responsibilities of the group entity The following functions and responsibilities of the group entity shall be specified:</p> <p>a) to implement and maintain an effective management system covering all group participants;"</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>NP 4406:</p> <p>B.5.3.2.1 "Functions and responsibilities of the group entity The following functions and responsibilities of the group entity shall be specified:...</p> <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;"</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>NP 4406:</p> <p>B.5.3.2.1 "Functions and responsibilities of the group entity The following functions and responsibilities of the group entity shall be specified:...</p> <p>c) to establish written procedures for the group organisation management;"</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>NP 4406:</p> <p>B.5.3.2.1 "Functions and responsibilities of the group entity The following functions and responsibilities of the group entity shall be specified:...</p> <p>d) to establish written procedures for the acceptance of new group organisation participants. These acceptance procedures shall cover at least the verification of the applicant's information about contact details, clear identification of their forest property (or other type of properties where are TOF) and its/their size(s);"</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
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>NP 4406:</p> <p>B.5.3.2.1 “Functions and responsibilities of the group entity The following functions and responsibilities of the group entity shall be specified:...</p> <p>e) to establish written procedures for the suspension and exclusion of participants who neither correct nor close nonconformities. Group participants excluded from any certification group based on nonconformities cannot be accepted within 12 months after exclusion;”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
f) to keep documented information of: i. the group entity and participants’ conformity with the requirements of the sustainable forest management standard, and other applicable requirements of the forest certification system, ii. all participants, including their contact details, identification of their forest property and its/their size(s), iii. the certified area, iv. the implementation of an internal monitoring programme, its review and any preventive and/or corrective actions taken;	YES	<p>NP 4406:</p> <p>B.5.3.2.1 “Functions and responsibilities of the group entity The following functions and responsibilities of the group entity shall be specified:...</p> <p>f) to keep documented information of: i. the group entity and participants’ conformity with the requirements of this standard, and other forest management certification system applicable requirements, ii. all participants, including their contact details, identification of their forest property and its/ their size(s) iii. the certified area; iv. the implementation of an internal monitoring programme, its review and any preventive and/or corrective actions taken;”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</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; 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	YES	<p>NP 4406:</p> <p>B.5.3.2.1 “Functions and responsibilities of the group entity The following functions and responsibilities of the group entity shall be specified:...</p> <p>g) to connect with all participants based on a binding written agreement which shall include the participants’ commitment to comply with this 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 in the event of nonconformity with this 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 an organisation or pre-existing group which can demonstrate the legal mandate to represent the participants and where its commitment and the terms and conditions of the contract are enforceable.”</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
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.		Compliance: Conformity Justification: 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.
h) to provide all participants with a document confirming participation in the group forest certification;	YES	NP 4406: B.5.3.2.1 "Functions and responsibilities of the group entity The following functions and responsibilities of the group entity shall be specified:..." h) to provide all participants a document confirming participation in the group forest management certification;" Compliance: Conformity Justification: 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	NP 4406: B.5.3.2.1 "Functions and responsibilities of the group entity The following functions and responsibilities of the group entity shall be specified:..." i) to provide all participants information and guidance required for the effective implementation and maintenance of the sustainable forest management standard and other applicable requirements of the forest management certification system;" Compliance: Conformity Justification: The document satisfies the PEFC requirement.
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	NP 4406: B.5.3.2.1 "Functions and responsibilities of the group entity The following functions and responsibilities of the group entity shall be specified:..." j) to address group members nonconformities reported which were identified under other PEFC certifications than the particular group certification and to ensure implementation with all group members;" Compliance: Conformity Justification: The document satisfies the PEFC requirement.
k) to operate an internal monitoring programme that provides for the evaluation of the participants' conformity with the certification requirements;	YES	NP 4406: B.5.3.2.1 "Functions and responsibilities of the group entity The following functions and responsibilities of the group entity shall be specified:..." k) to operate an internal monitoring programme that provides the evaluation of the participants' conformity with the certification requirements;"

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Compliance: Conformity Justification: The document satisfies the PEFC requirement.
l) to operate an annual internal audit programme covering both group members and group entity;	YES	NP 4406: B.5.3.2.1 "Functions and responsibilities of the group entity The following functions and responsibilities of the group entity shall be specified: l) to operate an annual internal audit programme covering both group members and group entity;" Compliance: Conformity Justification: 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	NP 4406: B.5.3.2.1 "Functions and responsibilities of the group entity The following functions and responsibilities of the group entity shall be specified: m) to operate a group forest management certification management review and acting on the results of the review;" Compliance: Conformity Justification: The document satisfies the PEFC requirement.
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	NP 4406: B.5.3.2.1 "Functions and responsibilities of the group entity The following functions and responsibilities of the group entity shall be specified: n) whether in connection with formal audits or reviews or otherwise related or with implications for the management system in responding effectively to all requests from the certification body, accreditation body, PEFC, the management system shall; i. provide full co-operation and assistance; ii. respond effectively to all requests for relevant data, documentation or other information; and iii. allow access to the group organisation forest area and other facilities." Compliance: Conformity Justification: The document satisfies the PEFC requirement.
5.1.2 Function and responsibilities of participants The standard requires that the following functions and responsibilities of the participants shall be specified:		
a) To provide the group entity with a binding written agreement, including a commitment on conformity with the sustainable forest management standard and other applicable requirements of the forest certification system; group	YES	NP 4406: B.5.3.2.2: "The following functions and responsibilities of the participants shall be specified: a) to provide the group entity with a binding written agreement, including a commitment on conformity with

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
<p>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>		<p>this standard and other applicable requirements of the forest management certification system; group participants excluded from any certification group cannot apply for group membership within 12 months after exclusion;</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 an organisation or pre-existing group which can demonstrate the legal mandate to represent the participants and where its commitment and the terms and conditions of the contract are enforceable.”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
<p>b) To provide the group entity with information about previous group participation.</p>	YES	<p>NP 4406:</p> <p>B.5.3.2.2: “The following functions and responsibilities of the participants shall be specified:...</p> <p>b) to provide the group entity information about previous group participation;”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
<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;</p>	YES	<p>NP 4406:</p> <p>B.5.3.2.2: “The following functions and responsibilities of the participants shall be specified:...</p> <p>c) to comply with this standard and other applicable requirements of the certification system as well as with the requirements of the management system;”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
<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;</p>	YES	<p>NP 4406:</p> <p>B.5.3.2.2: “The following functions and responsibilities of the participants shall be specified:</p> <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;</p> <p>e) whether in connection with formal audits or reviews or otherwise related or with implications for the management system in responding effectively to all requests from the certification body, accreditation body, PEFC, the participant shall; .</p> <p>i. provide full co-operation and assistance;</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>ii. respond effectively to all requests for relevant data, documentation or other information; and</p> <p>iii. allow access to the group organisation forest area and other facilities."</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>NP 4406:</p> <p>B.5.3.2.2: "The following functions and responsibilities of the participants shall be specified:...</p> <p>f) to inform the group entity about nonconformities identified under other PEFC certifications than the particular group certification"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
f) to implement relevant corrective and preventive actions established by the group entity.	YES	<p>NP 4406:</p> <p>B.5.3.2.2: "The following functions and responsibilities of the participants shall be specified:</p> <p>g) 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>NP 4406:</p> <p>B.5.1 "Leadership and commitment</p> <p>Top management (or the group entity, if delegated) shall commit to:</p> <p>a) apply Subsection 5.1 of this standard;"</p> <p>5.1 "Top management (or the organisation, if delegated) shall demonstrate leadership and commitment to the sustainable forest management system by:</p> <p>a) ensuring that the policy and sustainable forest management objectives establishment and their compatibility with the organisation's strategic orientation;</p> <p>b) ensuring sustainable forest management system's requirements integration in the organisation's business processes;</p> <p>c) ensuring the necessary resources for the sustainable forest management system are available;</p> <p>d) communicating the importance of effective sustainable forest management and its compliance with the sustainable forest management system requirements;</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>e) ensuring that the sustainable forest management system achieves the intended results;</p> <p>f) guiding and support people to contribute to the effectiveness of the sustainable forest management system;</p> <p>g) promoting continuous improvement;</p> <p>h) demonstrating their leadership support other relevant management functions, applicable to the extent of their respective areas of responsibility.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement as it requires the commitment to sustainable forest management system requirement (5.1d, e).</p>
b) to integrate the group certification requirements in the group management system;	YES	<p>NP 4406:</p> <p>B.5.1 "Leadership and commitment</p> <p>Top management (or the group entity, if delegated) shall commit to:</p> <p>b) include the group certification requirements in the group management system;"...</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>NP 4406:</p> <p>B.5.1 "Leadership and commitment</p> <p>Top management (or the group entity, if delegated) shall commit to:...</p> <p>c) improve the group's management system on an ongoing basis;"</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>NP 4406:</p> <p>B.5.1 "Leadership and commitment</p> <p>Top management (or the group entity, if delegated) shall commit to:...</p> <p>d) continuously support the improvement of the sustainable management of the member's forests."</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>NP 4406:</p> <p>B.5.1.1 "Top management's commitment (or the group entity, if delegated) may be part of the group's</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		management policy, and upon request shall be publicly available as documented information.”. Compliance: Conformity Justification: The document satisfies the PEFC requirement.
5.2.3 The standard requires that the participants shall provide a commitment		
a) to follow the rules of the management system;	YES	NP 4406: B.5.1.2 Participants shall commit to: a) comply with the management system rules;” Compliance: Conformity Justification: The document satisfies the PEFC requirement.
b) to implement the requirements of the sustainability standard in their operations in their area.	YES	NP 4406: B.5.1.2 Participants shall commit to:... b) implement this standard's requirements in the operations that take place in its area.” Compliance: Conformity Justification: The document satisfies the PEFC requirement.
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	NP 4406: B.6.2.4 “If a group organisation plans any changes in the group management system, these changes shall be included in a group management plan.” Compliance: Conformity Justification: The document satisfies the PEFC requirement.
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	NP 4406: B.6.3.2 “If a group organisation decides to fulfil this standard requirements at group level, these requirements shall be considered in a group management plan”. Compliance: Conformity Justification: The document satisfies the PEFC requirement.
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	NP 4406: B.7.1 “Resources Apply Subsection 7.1 of this standard”. 7.1 “Resources The organisation shall determine and provide the resources needed for the establishment, implementation, maintenance and continual improvement of the

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>sustainable forest management system, which include human, technological, financial resources, infrastructure and knowledge".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
7.2 The standard shall define the necessary competence of persons doing work in the group management system.	YES	<p>NP 4406:</p> <p>B.7.2.1 "The necessary competence of people working in the group management system shall define."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</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>NP 4406:</p> <p>B.7.3. "The communication processes shall be in place to raise the participant's awareness concerning:</p> <p>a) the group management policy;"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
b) the requirements of the sustainable forest management standard;	YES	<p>NP 4406:</p> <p>B.7.3. "The communication processes shall be in place to raise the participant's awareness concerning:</p> <p>b) the requirements of this standard"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement. The term "this standard" applies to NP 4406.</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>NP 4406:</p> <p>B.7.3. "The communication processes shall be in place to raise the participant's awareness concerning:</p> <p>c) their contribution to the group management system effectiveness and the sustainable forest management, including the benefits of improved group performance;"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
d) the implications of not conforming with the group management system requirements.	YES	<p>NP 4406:</p> <p>B.7.3. "The communication processes shall be in place to raise the participant's awareness concerning:</p> <p>d) the implications of nonconformities with the group management system requirements."</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Compliance: Conformity Justification: The document satisfies the PEFC requirement.
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	NP 4406: B.7.4.2 "The internal and external communications relevant to the group management system shall be determined. It includes: a) on what to communicate;" Compliance: Conformity Justification: The document satisfies the PEFC requirement.
b) when to communicate;	YES	NP 4406: B.7.4.2 "The internal and external communications relevant to the group management system shall be determined. It includes: b) when to communicate;" Compliance: Conformity Justification: The document satisfies the PEFC requirement.
c) with whom to communicate;	YES	NP 4406: B.7.4.2 "The internal and external communications relevant to the group management system shall be determined. It includes: c) with whom to communicate;" Compliance: Conformity Justification: The document satisfies the PEFC requirement.
d) how to communicate.	YES	NP 4406: B.7.4.2 "The internal and external communications relevant to the group management system shall be determined. It includes: d) how to communicate." In addition, NP 4406 also requires (B.7.4.2 e) "who communicates", in order to make clear who's in charge of each communication" Compliance: Conformity Justification: The document satisfies the PEFC requirement.
7.5 The standard requires that appropriate mechanisms shall be in place for resolving complaints and disputes relating to group management and	YES	NP 4406: B.7.4.5. "The appropriate mechanisms shall be in place for resolving complaints and disputes relating to group

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
sustainable forest management operations.		management, to sustainable forest management operations, land use rights and working conditions.” Compliance: Conformity Justification: The document satisfies the PEFC requirement.
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	NP 4406: B.7.5.2 “Designing and update Apply Subsection 7.5.2 of this standard.” 7.5.2.1 “Whenever designing and updating documented information, the organisation shall ensure adequate: a) identification and description (a title, date, author, or reference number); b) format (language, software version, graphic appearance) and support (paper, electronic); c) review and approval in terms of relevance and adequacy. 7.5.2.2 Documented information shall be relevant, that is, up-to-date and appropriate to the organisation's activities.”. Compliance: Conformity Justification: The document satisfies the PEFC requirement.
b) available and suitable for use, where and when it is needed;	YES	NP 4406: B.7.5.3 “Documented information control Apply Subsection 7.5.3 of this standard. In particular B.7.5.3.1 a)” 7.5.3.1a: “The documented information required by the sustainable forest management system and by this standard shall be controlled in order to ensure a) its availability and relevance for use wherever and whenever it is necessary;”. Compliance: Conformity Justification: The document satisfies the PEFC requirement.
c) adequately protected against loss of confidentiality, improper use, or loss of integrity.	YES	NP 4406: B.7.5.3 “Documented information control Apply Subsection 7.5.3 of this standard. In particular B.7.5.3.1 b)” 7.5.3.1b: “7.5.3.1 The documented information required by the sustainable forest management system and by this standard shall be controlled in order to ensure...

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		b) their adequate protection (loss of confidentiality or integrity, misuse)". Compliance: Conformity Justification: The document satisfies the PEFC requirement.
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	NP 4406: B.8: "The group organisation shall plan, implement and control processes needed: a) to meet the requirements of this Annex and Section 8; and". Compliance: Conformity Justification: The document satisfies the PEFC requirement.
b) to implement the actions determined in 6.	YES	NP 4406: B.8: "The group organisation shall plan, implement and control processes needed: b) to implement the actions determined in Section B.6" Compliance: Conformity Justification: The document satisfies the PEFC requirement.
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	NP 4406: B.8: "This planning, implementing and controlling shall be done by: a) defining the necessary processes and establishing their criteria;". Compliance: Conformity Justification: The document satisfies the PEFC requirement.
b) implementing control of the processes in accordance with the criteria;	YES	NP 4406: B.8: "This planning, implementing and controlling shall be done by: b) implementing processes' control in accordance with the criteria; Compliance: Conformity Justification: The document satisfies the PEFC requirement.
c) keeping documented information to the extent necessary to have confidence that	YES	NP 4406: B.8: "This planning, implementing and

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
the processes have been carried out as planned.		controlling shall be done by: c) keeping documented information to have evidence that the processes have been carried out as planned." Compliance: Conformity Justification: The document satisfies the PEFC requirement.
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	NP 4406: B.9.1.7 "The group organisation shall have an ongoing internal monitoring programme which ensures group organisation conformity with this standard. All participants shall be subject to internal monitoring programs." B.9.1 "Monitoring, measurement, analysis and evaluation B.9.1.1 "Apply Subsection 9.1.1 of this standard". 9.1.1: "The organisation shall determine: a) what needs to be monitored and measured;" Compliance: Conformity Justification: The document includes an identical requirement to PEFC ST 1002:2018.
b) the methods for monitoring, measurement, analysis and evaluation, as applicable, to ensure valid results;	YES	NP 4406: B.9.1.7 "The group organisation shall have an ongoing internal monitoring programme which ensures group organisation conformity with this standard. All participants shall be subject to internal monitoring programs." B.9.1 "Monitoring, measurement, analysis and evaluation B.9.1.1 "Apply Subsection 9.1.1 of this standard". 9.1.1: "The organisation shall determine:... b) the monitoring, measurement, analysis and evaluation methods to ensure valid results;" Compliance: Conformity Justification: The document satisfies the PEFC requirement.
c) when the monitoring and measuring shall be performed;	YES	NP 4406: B.9.1.7 "The group organisation shall have an ongoing internal monitoring programme which ensures group organisation conformity with this standard. All participants shall be subject to internal monitoring programs." B.9.1 "Monitoring, measurement, analysis and evaluation B.9.1.1 "Apply Subsection 9.1.1 of this standard".

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>9.1.1: "The organisation shall determine:...</p> <p>c) when monitoring and measurement should be carried out";</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
d) when the results from monitoring and measurement shall be analysed and evaluated;	YES	<p>NP 4406:</p> <p>B.9.1.7 "The group organisation shall have an ongoing internal monitoring programme which ensures group organisation conformity with this standard. All participants shall be subject to internal monitoring programs."</p> <p>B.9.1 "Monitoring, measurement, analysis and evaluation</p> <p>B.9.1.1 "Apply Subsection 9.1.1 of this standard".</p> <p>9.1.1: "The organisation shall determine:...</p> <p>d) when the analysis and evaluation of monitoring and measurement results should be carried out."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
e) what documented information shall be available as evidence of the results.	YES	<p>NP 4406:</p> <p>B.9.1.7 "The group organisation shall have an ongoing internal monitoring programme which ensures group organisation conformity with this standard. All participants shall be subject to internal monitoring programs."</p> <p>B.9.1 "Monitoring, measurement, analysis and evaluation</p> <p>B.9.1.2 "Apply Subsection 9.1.2 of this standard".</p> <p>9.1.2: "The organisation shall hold as evidence of the results the adequate documented information. The organisation shall assess the performance and effectiveness of the sustainable forest management system."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</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>B.9.1.8 "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."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
9.2 Internal audit		
9.2.1 Objectives		

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
9.2.1.1 The standard requires that an annual internal audit programme shall provide information on whether the group management system:		
a) conforms to i. the group organisation's own requirements for its group management system; ii. the requirements of the national group certification standard;	YES	<p>NP 4406:</p> <p>B.9.2.1 "Objectives</p> <p>Shall be established an annual internal audit programme which provide information on whether the group management system:</p> <p>a) conforms to:</p> <p>1) the group organisation's own requirements for its group management system; and</p> <p>2) the requirements of this annex".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement. The term "This Annex" covers the "group certification requirements/standard".</p>
b) ensures the implementation of the sustainable forest management standard on the participant level;	YES	<p>NP 4406:</p> <p>B.9.2.1 "Objectives</p> <p>Shall be established an annual internal audit programme which provide information on whether the group management system:</p> <p>b) ensures this standard implementation at participant level,"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
c) is effectively implemented and maintained.	YES	<p>NP 4406:</p> <p>B.9.2.1 "Objectives</p> <p>Shall be established an annual internal audit programme which provide information on whether the group management system:</p> <p>c) is effectively implemented and maintained."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
9.2.1.2 The standard requires that the internal audit programme shall cover the group entity and all group participants. The group entity shall be audited annually. The participants may be selected on a sample basis.	YES	<p>NP 4406:</p> <p>B.9.2.1 "The internal audit programme shall cover the group entity and all group participants. The group entity shall be annually audited. The participants may be selected on a sample basis."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
9.2.2 Organisation		

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
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	<p>NP 4406:</p> <p>B.9.2.2 "Apply Subsection 9.2.2 of this standard, according to the dimension and complexity of the certificate scope".</p> <p>9.2.2 "The organisation 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>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
b) definition of the audit criteria and scope for each audit;	YES	<p>NP 4406:</p> <p>B.9.2.2 "Apply Subsection 9.2.2 of this standard, according to the dimension and complexity of the certificate scope".</p> <p>9.2.2 "The organisation shall:</p> <p>b) define the audit criteria and scope for each audit;"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
c) competence of internal auditor (forest knowledge, standard knowledge);	YES	<p>NP 4406:</p> <p>B.9.2.2 "Apply Subsection 9.2.2 of this standard, according to the dimension and complexity of the certificate scope".</p> <p>9.2.2 "The organisation shall:...</p> <p>c) select the auditors and perform audits to ensure objectivity and the impartiality of the audit process. Whoever performs the internal audit shall not evaluate their own work and shall have forestry and standard competences;"</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>NP 4406:</p> <p>B.9.2.2 "Apply Subsection 9.2.2 of this standard, according to the dimension and complexity of the certificate scope".</p> <p>9.2.2 "The organisation shall:...</p> <p>c) select the auditors and perform audits to ensure objectivity and the impartiality of the audit process. Whoever performs the internal audit shall not evaluate their own work and shall have forestry and standard competences;"</p> <p>Compliance: Conformity</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Justification: The document satisfies the PEFC requirement.
e) ensuring that the results of the audits are reported to relevant group management;	YES	NP 4406: B.9.2.2 "Apply Subsection 9.2.2 of this standard, according to the dimension and complexity of the certificate scope". 9.2.2 "The organisation shall:..." d) ensure that the audits results are reported to the relevant management responsible according to the functions/units audited and to any other appropriate individuals; and". Compliance: Conformity Justification: The document satisfies the PEFC requirement.
f) retaining of the documented information as evidence of the implementation of the audit programme and the audit results.	YES	NP 4406: B.9.2.2 "Apply Subsection 9.2.2 of this standard, according to the dimension and complexity of the certificate scope". 9.2.2 "The organisation shall:..." e) retain documented information as evidence of the implementation of the audit programme and the audit results". 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	NP 4406: B.9.2.3.1.1 "The selection requirements of participants in the internal audit programme shall include the procedures for: a) sample size determination (B.9.2.3.2);" Compliance: Conformity Justification: The document satisfies the PEFC requirement.
b) determination of sample categories(9.3.3);	YES	NP 4406: B.9.2.3.1.1 "The selection requirements of participants in the internal audit programme shall include the procedures for:..."

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		b) sample categories determination (B.9.2.3.3);" Compliance: Conformity Justification: The document satisfies the PEFC requirement.
c) distribution of the sample to the categories (9.3.4);	YES	NP 4406: B.9.2.3.1.1 "The selection requirements of participants in the internal audit programme shall include the procedures for:..." c) sample categories distribution (B.9.2.3.3);". Compliance: Conformity Justification: The document satisfies the PEFC requirement.
d) selection of the participants (9.3.5).	YES	NP 4406: B.9.2.3.1.1 "The selection requirements of participants in the internal audit programme shall include the procedures for:..." d) participants selection (B.9.2.3.4)." Compliance: Conformity Justification: The document satisfies the PEFC requirement.
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. NP 4406 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.	YES	NP 4406: B.9.2.3.1.2 "Areas included in groups formally constituted and represented by it, with management delegation and power to do it, will be considered as a single participant, for the purposes of sampling and compliance verification." Compliance: Compliance Justification: The standard allows participation of "sub-groups". Those formally constituted groups are considered as a single participant within the sampling methodology. An important pre-condition for this arrangement is that groups shall be formally constituted and shall include "management delegation". This means that the group and represented area has a common forest management, similar to a scenario of a single forest owner. Following the requirements of the standard, this sub-group would be considered as a single participant. Where the group (participant) is selected for an internal audit,

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		the forest area represented by the group would be audited in the same / similar way as if the area would belong to a single forest owner.
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	NP 4406: B.9.2.3.2.1 "The sample size shall be applied to the group organisation participants." Compliance: Conformity Justification: The document satisfies the PEFC requirement.
9.3.2.2 The size of the sample generally should be the square root of the number of participants: ($y=\sqrt{x}$), rounded to the upper whole number.	YES	NP 4406: B.9.2.3.2.2 "The minimum sample size should be the square root of the number of participants: ($y=\sqrt{x}$), rounded to the upper whole number." Compliance: Conformity Justification: The document satisfies the PEFC requirement.
9.3.2.3 The size of the sample may be adapted by a standard taking into account one or more of the following indicators:		
a) results of a risk assessment. In this case deviations of sample sizes in case of low or high risk for individual categories shall be defined;	YES	NP 4406: B.9.2.3.2.3 "The sample size may be adapted taking into account:..." a) risk assessment results (B.9.2.3.3);" B.9.2.3.3.2 "Conditions which constitute for each indicator low, medium and high level risk shall be defined. The organisation shall determine sample size deviations. In high-risk cases, the sample size should be increased and in low-risk cases it can be reduced." Compliance: Conformity Justification: The document satisfies the PEFC requirement.
b) results of internal audits or previous certification audits;	YES	NP 4406: B.9.2.3.2.3 "The sample size may be adapted taking into account: b) internal audits or previous certification audits". Compliance: Conformity Justification: The document satisfies the PEFC requirement.
c) quality / level of confidence of the internal monitoring programme;	YES	NP 4406: B.9.2.3.2.3 "The sample size may be adapted taking into account:..." c) confidence of the internal monitoring programme (considered B.9.2.3.2.3 b, B.9.2.3.3);"

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Compliance: Conformity Justification: The document satisfies the PEFC requirement.
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.	YES	NP 4406: B.9.2.3.2.3 "The sample size may be adapted taking into account:..." d) use of technologies which allow gathering information concerning specified requirements; NOTE: Such technologies may be eg. the use of satellite data or drones which allow requirements compliance with the sustainability standard or support the risk based sampling" Compliance: Conformity Justification: The document satisfies the PEFC requirement.
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.	YES	NP 4406: B.9.2.3.2.3 "The sample size may be adapted taking into account:..." e) other means of gathering information about activities on the in situ. NOTE: One way could be a survey with participants who provide some information about their activities in situ which allow requirements compliance." Compliance: Conformity Justification: The document satisfies the PEFC requirement.
9.3.3 Determination of sample categories		
9.3.3.1 The sample categories shall be established based on the results of a risk assessment. The indicators used in the risk assessment shall reflect the geographical scope of the standard. The following non exhaustive list of indicators may be used for the risk assessment:		
a) ownership type (e.g. state forest, communal forest, private forest);	YES	NP4406: B.9.2.3.3.1 "The certified area sample categories shall be established based on the risk assessment results. The indicators used in the risk assessment shall reflect the standard geographical scope. The group management entity shall determine the indicators applicable to its risk assessment context. The following non exhaustive list of indicators may be used for the risk assessment:" a) ownership type (e.g. state, communal or private forest);" Compliance: Conformity Justification: The document satisfies the PEFC requirement.
b) size of management units (different size classes);	YES	NP4406: B.9.2.3.3.1 "The certified area sample categories shall be established based on the risk assessment results. The indicators used in the risk assessment shall reflect the

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>standard geographical scope. The group management entity shall determine the indicators applicable to its risk assessment context. The following non exhaustive list of indicators may be used for the risk assessment:"...</p> <p>b) management units size (size classes);"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
c) biogeographic region (e.g. lowlands, low mountain range, high mountain range);	YES	<p>NP4406:</p> <p>B.9.2.3.3.1 "The certified area sample categories shall be established based on the risk assessment results. The indicators used in the risk assessment shall reflect the standard geographical scope. The group management entity shall determine the indicators applicable to its risk assessment context. The following non exhaustive list of indicators may be used for the risk assessment:"...</p> <p>c) edaphoclimatic region (e.g.: sandy soils plains; mountain areas; sloping slopes of granitic soils; skeletal schist soils);</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
d) operations, processes and products of potential group participants;	YES	<p>NP4406:</p> <p>B.9.2.3.3.1 "The certified area sample categories shall be established based on the risk assessment results. The indicators used in the risk assessment shall reflect the standard geographical scope. The group management entity shall determine the indicators applicable to its risk assessment context. The following non exhaustive list of indicators may be used for the risk assessment:"...</p> <p>d) operations, that have taken place, are in progress and are planned by the members group participants"</p> <p>e) different products within the scope and other possible existing in the certified area</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
e) deforestation and forest conversion;	YES	<p>NP4406:</p> <p>B.9.2.3.3.1 "The certified area sample categories shall be established based on the risk assessment results. The indicators used in the risk assessment shall reflect the standard geographical scope. The group management entity shall determine the indicators applicable to its risk assessment context. The following non exhaustive list of indicators may be used for the risk assessment:"...</p> <p>f) deforestation and forest conversion;</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.
f) rotation period(s);	YES	<p>NP4406:</p> <p>B.9.2.3.3.1 "The certified area sample categories shall be established based on the risk assessment results. The indicators used in the risk assessment shall reflect the standard geographical scope. The group management entity shall determine the indicators applicable to its risk assessment context. The following non exhaustive list of indicators may be used for the risk assessment:"...</p> <p>k) forest composition and silviculture systems;"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
g) richness of biological diversity;	YES	<p>NP4406:</p> <p>B.9.2.3.3.1 "The certified area sample categories shall be established based on the risk assessment results. The indicators used in the risk assessment shall reflect the standard geographical scope. The group management entity shall determine the indicators applicable to its risk assessment context. The following non exhaustive list of indicators may be used for the risk assessment:"...</p> <p>g) location in protected areas;"</p> <p>k) forest composition and silviculture systems;"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
h) recreation and other socio-economic functions of the forest;	YES	<p>NP4406:</p> <p>B.9.2.3.3.1 "The certified area sample categories shall be established based on the risk assessment results. The indicators used in the risk assessment shall reflect the standard geographical scope. The group management entity shall determine the indicators applicable to its risk assessment context. The following non exhaustive list of indicators may be used for the risk assessment:"...</p> <p>h) recreation and other socio-economic forest functions;"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
i) dependence of and interaction with local communities and indigenous people;	YES	<p>NP4406:</p> <p>B.9.2.3.3.1 "The certified area sample categories shall be established based on the risk assessment results. The indicators used in the risk assessment shall reflect the standard geographical scope. The group management entity shall determine the indicators applicable to its risk assessment context. The following non exhaustive list of indicators may be used for the risk assessment:"...</p> <p>a) ownership type (e.g. state, communal or private forest);"</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Compliance: Conformity Justification: The document satisfies the PEFC requirement.
j) available resources for administration, operations, training and research;	YES	NP4406: B.9.2.3.3.1 "The certified area sample categories shall be established based on the risk assessment results. The indicators used in the risk assessment shall reflect the standard geographical scope. The group management entity shall determine the indicators applicable to its risk assessment context. The following non exhaustive list of indicators may be used for the risk assessment:"... i) dependence of and interaction with local communities" Compliance: Conformity Justification: The document satisfies the PEFC requirement.
k) governance and law enforcement.	N/A	Compliance: Not applicable Justification: PEFC ST 1003 provides the risk criteria as non-exhaustive list where individual criteria should be used based on their relevancy within the national context. Portugal has a single forest legislation framework and a dedicated authority to enforce it. Therefore the risk within Portugal does not vary in between various regions. Other indicators were added: l) group participants antiquity; m) existence of excluded areas; and n) other indicators considered as risky.
9.3.3.2 Conditions which constitute risk for each indicator on low, medium and high level and the respective consequences for the sampling shall be defined.	YES	NP4406: B.9.2.3.3.2 Conditions which constitute for each indicator low, medium and high level risk shall be defined. The organisation shall determine sample size deviations. In high-risk cases, the sample size should be increased and in low-risk cases it can be reduced." Compliance: Conformity Justification: The document satisfies the PEFC requirement.
9.3.4 Distribution of the sample The sample shall be distributed to the categories according to the result of the risk assessment.	YES	NP4406: B.9.2.3.4.2 "A risk-based procedure for selecting participants shall be established. It shall be ensured the participants sample distribution is made among the different strata in accordance with the risk assessment. NOTE: The participants sample shall include auditing certified areas in the three risk levels." Compliance: Conformity Justification: The standard requires that distribution of the participants' sample is made among the different strata (sample categories) based on the risk assessment.

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>NP 4406:</p> <p>"B.9.2.3.4.1 At least 25% of the sample should be selected randomly"</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>NP 4406:</p> <p>B.9.2.3.4.2 "A risk-based procedure for selecting participants shall be established. It shall be ensured the participants sample distribution is made among the different strata in accordance with the risk assessment.</p> <p>NOTE: The participants sample shall include auditing certified areas in the three risk levels."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</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>NP 4406:</p> <p>B.9.3.1 "Top management (or the group entity, if delegated) shall carry out the management review as defined in Subsection 9.3, ..."</p> <p>9.3.1 "a) the status of actions from previous management reviews;"</p> <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>NP 4406:</p> <p>B.9.3.1 "Top management (or the group entity, if delegated) shall carry out the management review as defined in Subsection 9.3, including also:</p> <p>a) changes in external and internal issues that are relevant to the group management system;"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
c) the status of conformity with the sustainable forest management standard, that includes reviewing the results of the internal monitoring programme, the internal audit and the certification body's evaluations and surveillance;	YES	<p>NP 4406:</p> <p>B.9.3.1 "Top management (or the group entity, if delegated) shall carry out the management review as defined in Subsection 9.3, including also:...</p> <p>b) the conformity status with this standard, including the internal monitoring programme reviewing results, the</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		internal audit and the certification body's evaluations and surveillance". 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	NP 4406: B.9.3.1 "Top management (or the group entity, if delegated) shall carry out the management review as defined in Subsection 9.3, including also:..." c) information on the group performance." 9.3.1 "c) information on the organisation's performance, including trends in: i. nonconformities and corrective actions; ii. monitoring and measurement results; and iii. audit results;" Compliance: Conformity Justification: The document satisfies the PEFC requirement.
e) opportunities for continual improvement.	YES	NP 4406: B.9.3.1 "Top management (or the group entity, if delegated) shall carry out the management review as defined in Subsection 9.3, including also:..." d) opportunities for continual improvement." Compliance: Conformity Justification: The document satisfies the PEFC requirement.
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	NP 4406: B.9.3.2 "The outputs of the management review shall 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.
9.4.3 The standard requires that the group organisation shall retain documented information as evidence of the results of management reviews.	YES	NP 4406: B.9.3.3 "The group organisation shall maintain documented information as evidence of the management reviews results." Compliance: Conformity Justification: The document satisfies the PEFC requirement.
10. Improvement		

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
10.1 Nonconformity and corrective action		
10.1.1 The standard requires when a nonconformity occurs, the group organisation shall:		
a) react to the nonconformity and, as applicable: i. take action to control and correct it; ii. deal with the consequences;	YES	<p>NP 4406:</p> <p>B.10.1.1 "In addition to the necessary actions as defined in Section 10 of this standard the group organisation shall make changes to the group management system".</p> <p>10.1.1a) "react to the nonconformity and, as applicable: i. take action to control and correct it; and ii. deal with the consequences;"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
b) evaluate the need for action to eliminate the causes of the nonconformity, in order that it does not recur or occur elsewhere, by: i. reviewing the nonconformity; ii. determining the causes of the nonconformity; iii. determining if similar nonconformities exist, or could potentially occur;	YES	<p>NP 4406:</p> <p>B.10.1.1 "In addition to the necessary actions as defined in Section 10 of this standard the group organisation shall make changes to the group management system".</p> <p>10.1.1 b) "evaluate the need for action to eliminate the causes of the nonconformity, in order that it does not recur or occur elsewhere, by: i. reviewing the nonconformity; ii. determining the causes of the nonconformity; iii. determining if similar nonconformities exist, or could potentially occur;"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
c) implement any action needed;	YES	<p>NP 4406:</p> <p>B.10.1.1 "In addition to the necessary actions as defined in Section 10 of this standard the group organisation shall make changes to the group management system".</p> <p>10.1.1 c) "implement any action needed;"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
d) review the effectiveness of any corrective action taken;	YES	<p>NP 4406:</p> <p>B.10.1.1 "In addition to the necessary actions as defined in Section 10 of this standard the group organisation shall make changes to the group management system".</p> <p>10.1.1 d) "review the effectiveness of any corrective action taken; and"</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)
e) make changes to the group management system, if necessary.	YES	<p>NP 4406:</p> <p>B.10.1.1 "In addition to the necessary actions as defined in Section 10 of this standard the group organisation shall make changes to the group management system".</p> <p>10.1.1 e) "if necessary make changes to the forest management system."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
10.1.2 The standard requires that the group organisation shall retain documented information as evidence of:		
a) the nature of the nonconformities and any subsequent actions taken;	YES	<p>NP 4406:</p> <p>B.10.1.2 "Apply Subsection 10.1.2 of this standard".</p> <p>10.1.3 "The organisation shall retain documented information as evidence of:</p> <p>a) the nature of the nonconformities and any subsequent actions taken;"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
b) the results of any corrective action.	YES	<p>NP 4406:</p> <p>B.10.1.2 "Apply Subsection 10.1.2 of this standard".</p> <p>10.1.3 "The organisation shall retain documented information as evidence of:</p> <p>b) the results of any corrective action."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</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>NP 4406:</p> <p>B.10.1.4 "The participant excluded from a group forest management certification shall be internally audited by the group entity before it is allowed to re-enter the group forest management certification. The internal audit shall not take place sooner than 12 months after the exclusion.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
10.2 Continual improvement The standard requires that the suitability, adequacy and effectiveness of the group management system and the sustainable management of the forest shall be continuously improved.	YES	<p>NP 4406:</p> <p>B.10.2 "Continual improvement</p> <p>The group organisation shall continually improve the suitability, adequacy and effectiveness of the group sustainable forest management system."</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.

Annex C: Detailed assessment of sustainable forest management 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	NP 4406: 4.4.1 "The organisation shall establish, implement, maintain and continuously improve a sustainable forest management system, including the necessary processes and their interactions, in accordance with the requirements of this standard, appropriate to the applicable level: individual, group, regional: a) meet the performance requirements of this document to ensure that all are met in a long-term perspective". Compliance: Conformity Justification: The standard includes management and performance-based requirements that are applicable at individual group or regional levels.
b) be clear, performance based and auditable;	YES	NP 4406: 4.4.1 "The organisation shall establish, implement, maintain and continuously improve a sustainable forest management system, including the necessary processes and their interactions, in accordance with the requirements of this standard, appropriate to the applicable level: individual, group, regional: 4.4.1 b) be clear and auditable". Compliance: Conformity Justification: The standard requires that the implemented management system shall be clear and auditable. The requirements of the standard are considered as clear and auditable. Where a specific requirement of NP 4406 would not satisfy this expectation, a non-conformity is assigned for the specific PEFC requirement.
c) apply to activities of all forest operators in the defined forest area who have an impact on achieving compliance with the requirements;	YES	NP 4406: 4.4.1 "The organisation shall establish, implement, maintain and continuously improve a sustainable forest management system, including the necessary processes and their interactions, in accordance with the requirements of this standard, appropriate to the applicable level: individual, group, regional: c) be suitable for agents with activities in the defined certified area, which have an impact on compliance with the requirements;" Compliance: Minor non-conformity

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>Justification:</p> <p>The standard explicitly states that “the management system shall be “suitable” for agents with activities in the defined forest area”. However, this wording does not ensure the objective of the PEFC requirement 4.1c that all operators in the defined forest area shall comply with the Standard.</p> <p>PEFC Portugal argues that the wording “shall be suitable to” is equivalent to “shall apply to”.</p> <p>However, the meaning of the word “suitable” is “acceptable” or “right to someone or something”⁷ and synonyms to this word would be “appropriate to” or “fitting to”.</p> <p>In contrary, the wording “apply” refers to “to relate to” or “to make use of something”⁸.</p> <p>Within the context of PEFC ST 1003, the wording “the management system shall be suitable to all agents” is not the same as “the management system shall apply to all agents”.</p>
d) require record-keeping that provides evidence of compliance with the requirements of the forest management standards;	YES	<p>NP 4406:</p> <p>4.4.1 “The organisation shall establish, implement, maintain and continuously improve a sustainable forest management system, including the necessary processes and their interactions, in accordance with the requirements of this standard, appropriate to the applicable level: individual, group, regional:</p> <p>d) ensure records maintenance that provide evidence of compliance with the standard.”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard requires to maintain records as evidence of compliance with the standard (4.4.1d).</p>
<p>e) specify “100% PEFC certified”, or another system specific claim, as claim to be used to communicate the origin of products in an area covered by the standard to customers with a PEFC chain of custody;</p> <p>Note: System specific claims of PEFC endorsed standards and PEFC Council approved abbreviations of such claims and the claim “100% PEFC certified”, and their translations into languages other than English, are published online on the PEFC website www.pefc.org.</p>	YES	<p>NP 4406:</p> <p>4.4.1 “...Each sale of a certified product shall be supported by an invoice or equivalent accounting document, which specifies:</p> <p>7) the PEFC claim recognized by the applicable certification system”.</p> <p>3.1.4 “PEFC claim</p> <p>Organisation (3.1.37) information on materials/products, declared in the sales and delivery documentation.</p> <p>NOTE 1: The above definition applies within PEFC ST 2002:2020 Standard scope.</p> <p>NOTE 2: The “100% PEFC certified” or other system-specific claim, shall be specified to demonstrate to PEFC chain-of-custody customers that products are originated from a certified area.</p>

⁷ [SUITABLE | English meaning - Cambridge Dictionary](#)

⁸ [APPLY | English meaning - Cambridge Dictionary](#)

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>NOTE 3: The specific claims of the standards system recognized by PEFC, the abbreviations of such claims approved by the PEFC Council, the claim "100% PEFC certified" and their translation into languages other than English are published on the PEFC website www.pefc.org".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard states that the sales documentation shall include "PEFC claim recognized by the applicable certification system" (4.4.2). The definition of the term "PEFC claim" makes reference to the claim "100 % PEFC certified" or other system-specific claim recognised by the PEFC Council (3.1.4).</p>
f) require that where owners/managers of forests are selling products from areas other than covered by the standard, only products from areas covered by the standard are sold with the claim "100% PEFC-certified" or a system specific claim;	YES	<p>NP 4406:</p> <p>4.4.3 "The organization shall ensure that only products from the certified area are sold with a "100% PEFC certified" claim or with a system specific PEFC claim.".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires that the usage of the PEFC claim "100% PEFC certified" is only allowed for products sourced from the certified area (4.4.3).</p>
g) require that claims on the origin of products in an area covered by the standard are only made by forest owners/managers covered by a PEFC recognised certificate issued against the standard;	YES	<p>NP 4406:</p> <p>4.4.4 "The organization shall ensure that the products' origin claims of certified area are made only by holders of a recognized PEFC certificate".</p> <p>4.4.5 "Only for invoicing and if the certificate holder intends to authorize the invoice to be issued in another person or entity name, this must be documented, legally authorized and approved by the certificate holder.".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires that the PEFC claim shall only be used for products originating in the certified area (4.4.4). An exemption I made for situation where invoicing or sale is made by another person that is authorised by the certificate holder (4.4.5). This situation should for example apply to sales within family relatives. This exemptional arrangement still guarantees that only timber from certified area can be sold with the PEFC claim.</p>
h) specify requirements concerning the information which need to be provided to a PEFC chain of custody certified customer;	YES	<p>NP 4406:</p> <p>4.4.2 "The organization shall have documentation which describes the products selling process, including its control and registration. Each sale of a certified product must be supported by an invoice or equivalent accounting document, which specifies:</p> <ol style="list-style-type: none"> 1) buyer's identification; 2) supplier's identification; 3) products' identification according to the PEFC categories;

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>4) products' quantity (eg volume, weight);</p> <p>5) sale's date or period;</p> <p>6) product's origin (estate identification);</p> <p>7) the PEFC claim recognized by the applicable certification system; and</p> <p>8) organization's PEFC recognized certificate code.".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard defines information that shall be provided to customers for products originating from the certified area (4.4.2).</p> <p>The information complies with PEFC ST 2002:2020 (PEFC international CoC standard).</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>All requirements of PEFC ST 1003(except those listed under identified non-conformities) are satisfied directly by NP4406.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The NP 4406 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>NP 4406:</p> <p>4.2.1 "The organization shall determine:</p> <p>a) the affected stakeholders that are relevant to the sustainable forest management;".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires to identify affected stakeholders (4.2.1a).</p>
b) the relevant needs and expectations of these stakeholders.	YES	<p>NP 4406:</p> <p>4.2.1 "The organization shall determine:</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 relevant needs and expectations of the identified stakeholders (4.2.1b).</p>
4.3 Determining the scope of the management system		
4.3.1 The standard requires that the organisation shall determine the	YES	<p>NP 4406:</p> <p>4.3.1 "The organisation shall determine the boundaries and applicability of the management system to establish</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
boundaries and applicability of the management system to establish its scope.		<p>its scope. In determining this scope, the organization shall consider:</p> <p>a) the external and internal matters referred to in Section 4.1;</p> <p>b) the requirements referred to in Section 4.2;</p> <p>c) the applicable level: individual, group, regional.</p> <p>The scope should be available as documented information identifying woody and non-woody products.”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard requires identification of the scope of the management system (4.3.1).</p>
4.3.2 The standard requires that forest management shall comprise the cycle of inventory and planning, implementation, monitoring and evaluation, and shall include an appropriate assessment of the social, environmental and economic impacts of forest management practices. This shall form a basis for a cycle of continuous improvement.	YES	<p>NP 4406:</p> <p>4.3.2 “The forest management shall comprise planning, implementation, monitoring and evaluation (cycle PDCA), and shall include an appropriate assessment of the social, environmental and economic impacts of forest management practices. This information shall form the basis for a cycle of continuous improvement.”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard requires the cycle of planning, implementation, monitoring and evaluation (PDCA cycle) and an appropriate assessment of social, environmental and economic impacts (4.3.2).</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>NP 4406:</p> <p>5.1 “Top management (or the organisation, if delegated) shall demonstrate leadership and commitment to the sustainable forest management system by:</p> <p>a) ensuring that the policy and sustainable forest management objectives establishment and their compatibility with the organisation’s strategic orientation;</p> <p>b) ensure sustainable forest management system’s requirements integration in the organisation’s business processes;</p> <p>c) ensure the necessary resources for the sustainable forest management system are available;</p> <p>d) communicate the importance of effective sustainable forest management and its compliance with the sustainable forest management system requirements;</p> <p>e) ensure that the sustainable forest management system achieves the intended results;</p> <p>f) guide and support people to contribute to the effectiveness of the sustainable forest management system;</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>g) promote continuous improvement;</p> <p>h) to demonstrate their leadership support other relevant management functions, applicable to the extent of their respective areas of responsibility”.</p> <p>5.2.1 Top management shall establish a sustainable forest management policy that:</p> <p>a) is suitable for the organisation’s purpose;</p> <p>b) provide a framework for defining sustainable forest management objectives;</p> <p>c) includes a commitment to meet applicable requirements, and</p> <p>d) include a commitment to sustainable forest management system continuous improvement.”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires the commitment to comply with the applicable scheme requirements and to continuously improve the SFM (5.2.1).</p>
b) to continuously improve the sustainable forest management system.	YES	<p>See 5.1.a</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires the commitment to comply with the applicable scheme requirements and to continuously improve the SFM (5.2.1).</p>
5.2 The standard requires that this commitment shall be publicly available.	YES	<p>NP 4406:</p> <p>5.2.2 “Sustainable forest management policy shall be:</p> <p>a) made available as documented information;</p> <p>b) communicated within the organisation; and</p> <p>c) made available as appropriate to stakeholders”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires a publicly available commitment/policy (5.2.2).</p>
5.3 The standard requires that responsibilities for sustainable forest management shall be clearly defined and assigned.	YES	<p>NP 4406:</p> <p>5.3.1 “Top management must ensure that for roles that are relevant within the organization responsibilities and authorities are assigned and communicated.</p> <p>Top management must assign responsibility and authority to:</p> <p>a) ensure that the sustainable forest management system complies with the requirements of this document, and</p> <p>b) report to top management the performance of the sustainable forest management system”.</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>5.3.2 "Sustainable forest management responsibilities within the organization must be clearly defined and assigned".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires to identify and assign responsibilities for the SFM and for management system (5.3.1, 5.3.2).</p>
6. Planning		
6.1 Actions to address risks and opportunities		
<p>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.</p>	YES	<p>NP 4406:</p> <p>6.1.1 When planning a sustainable forest management system, the organisation shall consider the issues referred to in 4.1, 4.2 and Section 8 and determine the risks and opportunities that shall be addressed to:</p> <p>a) provide guarantees that the sustainable forest management system can achieve the intended results;</p> <p>b) prevent or reduce unwanted effects;</p> <p>c) excluded areas;</p> <p>d) achieve continuous improvement".</p> <p>6.1.2 "The organisation shall plan:</p> <p>a) actions to address these risks and opportunities, and</p> <p>b) how to:</p> <p>i. integrate and implement actions in the processes of the sustainable forest management system</p> <p>ii. evaluate the effectiveness of these actions".</p> <p>6.1.3 "The organisation shall consider risks and opportunities concerning compliance with the requirements for sustainable forest management. Size and scale of the operations of the organisation shall be considered".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires to identify risk and opportunities, including consideration of size and scale of operations and plan actions addressing those risks and opportunities (6.1.1-6.1.3)</p>
<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.</p>	YES	<p>NP 4406:</p> <p>6.1.4 "Inventory and mapping of forest resources, biodiversity and habitat (including protected or threatened and endemic species) shall be established and maintained, adequate to local and national conditions and in correspondence with the requirements described in this international benchmark standard".</p> <p>Compliance: Conformity</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Justification: The Standard requires inventory and mapping of forest resources (6.1.4).
6.2 Management plan		
6.2.1 The standard requires that management plans shall be:		
a) elaborated and periodically updated or continually adjusted;	YES	NP 4406: 6.3 "The sustainable forest management plan shall: a) elaborated and periodically updated or continually adjusted;" Compliance: Conformity Justification: The Standard requires elaboration and periodic revision of forest management plans (6.3a).
b) appropriate to the size and use of the forest area;	YES	NP 4406: 6.3 "The sustainable forest management plan shall: b) appropriate to the size and use of the certified area;" Compliance: Conformity Justification: The Standard requires the forest management plans to be appropriate to the size and used of forest area (6.3b).
c) based on applicable local, national and international legislation as well as existing land-use or other official plans; and	YES	NP 4406: 6.3 "The sustainable forest management plan shall: c) comply with legislation, as well as other planning instruments, in particular the planning legal regime, management and intervention programs and plans for the forestry sector;" Compliance: Conformity Justification: The Standard requires compliance of the forest management planning with legal requirements (6.3c).
d) adequately covering forest resources.	YES	NP 4406: 6.3 "The sustainable forest management plan shall: d) adequately cover forest resources;" Compliance: Conformity Justification: The Standard requires the forest management plans to be adequately cover forest resources. (6.3d).
6.2.2 The standard requires that management plans shall take into account	YES	NP 4406: 6.3 "The sustainable forest management plan shall:

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>e) take into account the different uses or functions of the certified area;”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires the forest management plans to take into account the different uses or functions of forests. (6.3e).</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>NP 4406:</p> <p>6.3 “The sustainable forest management plan shall:</p> <p>g) include at least a description of the current certified area, long-term objectives, and the average annual allowable cut, plan, including its justification;”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires the forest management plans to include at least description of the current certified area, long-term objectives, and the average annual allowable cut, plan, including its justification (6.3f).</p>
6.2.4 The standard requires that the annually allowable use of non-wood forest products shall be included in the management plan where forest management covers commercial use of non-wood forest products at a level which can have an impact on their long-term sustainability.	N/A	<p>NP 4406:</p> <p>6.3 “The sustainable forest management plan shall:</p> <p>h) define the annual allowed use of non-woody forest products, if there is commercial use by forest management at a level that could compromise their long-term sustainability;”</p> <p>Compliance: Not applicable</p> <p>Justification:</p> <p>The Standard requires the forest management plans to include sustainable use of non-wood forest products. (6.3h).</p>
6.2.5 The standard requires that management plans specify ways and means to minimise the risk of degradation and damage to forest ecosystems.	YES	<p>NP 4406:</p> <p>6.3 “The sustainable forest management plan shall:</p> <p>i) define measures to minimize the risk of degradation and damage to forest ecosystems;”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires the forest management plans to define measures to minimize the risk of degradation and damage to forest ecosystems (6.3i).</p>
6.2.6 The standard requires that management plans shall take into account the results of scientific research.	YES	<p>NP 4406:</p> <p>6.3 “The sustainable forest management plan shall:</p> <p>j) consider the results of scientific research, monitoring and emergency and disaster situations, with an impact on the certified area.”</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Compliance: Conformity Justification: The Standard requires the forest management plans to take into account the results of scientific research but also the results of monitoring, emergencies and calamity situations (6.3j).
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	NP 4406: 6.3.1 "A summary of the management plan shall be publicly available and include at least a description of the current area under management and information on the long-term objectives, respecting the confidentiality of the information". Compliance: Conformity Justification: The Standard require public availability of forest management plans (6.3.1) while respecting confidentiality of the information.
6.2.8 The standard requires that the publicly available summary of the management plan may exclude confidential business and personal information and other information made confidential by applicable legislation or for the protection of cultural sites or sensitive natural resource features.	YES	NP 4406: 6.3.1 "...Information on business activity and personal data, as well as other information confidential by legislation or for the protection of places of cultural value or sensitive natural resources, may be excluded." Compliance: Conformity Justification: The Standard allows that any commercially sensitive information, personal data, information confidential by legislation and required by nature protection objectives to be excluded from publication (6.3.1).
6.3 Compliance requirements		
6.3.1 Legal compliance		
6.3.1.1 The standard requires that the organisation shall identify and have access to the legislation applicable to its forest management and determine how these compliance obligations apply to the organisation. Note: For a country which has signed a FLEGT Voluntary Partnership Agreement (VPA) between the European Union and the producing country, the "legislation applicable to forest management" is defined by the VPA agreement.	YES	NP 4406: 4.2.3.1 "The organization must identify and have access to applicable legislation within the framework of the sustainable forest management system and determine how these legal obligations apply to the organization. NOTE: Annex D of this document identifies the sources of information on which the organization can be guided." Compliance: Conformity Justification: The Standard requires identification of the relevant regulations (4.2.2.1). The FLEGT Voluntary Partnership Agreement (VPA) is not applicable to Portugal and is therefore not referenced in the standard.

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
6.3.1.2 The standard requires that the organisation shall comply with applicable local, national and international legislation on forest management, including but not limited to forest management practices; nature and environmental protection; protected and endangered species; property, tenure and land-use rights for indigenous peoples, local communities or other affected stakeholders; health, labour and safety issues; anti-corruption and the payment of applicable royalties and taxes.	YES	<p>NP 4406:</p> <p>4.2.2.2 "The organisation shall comply with local, national and international legislation applicable to forest management, including that to forest management practices; protection of environment and nature; protected and endangered species; ownership, tenure and use rights by local communities or other affected stakeholders; labour, health and safety, anti-corruption issues and the payment of applicable legal obligations".</p> <p>4.2.2.4 If conflicts between laws, regulations, treaties and international agreements are identified, the organisation shall demonstrate the application of measures to resolve them."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires identification of the relevant regulations and defines areas of the applicable legislation that is complying with the PEFC requirement (4.2.2.2).</p> <p>In Portugal, there are no Indigenous Peoples as defined by the United Nations Declaration(https://www.un.org/esa/socdev/unpfii/documents/DRIPS_en.pdf), therefore they were not mentioned in the standard.</p>
6.3.1.3 The standard requires that where no anti-corruption legislation exists, the organisation must take alternative anti-corruption measures appropriate to the risk of corruption.	YES	<p>Portuguese legislation recognises the following basic offences in the area of bribery and corruption⁹:</p> <ul style="list-style-type: none"> • undue receipt of an advantage by a public official, punishable under Article 372 of the Criminal Code; • passive and active corruption in the public sector, punishable under Articles 373 and 374 of the Criminal Code; • undue receipt of an advantage by a political or high public official, punishable under Article 16 of Law 34/87 (16 July 1987); • passive and active corruption of political and high public officials, punishable under Articles 17 and 18 of Law 34/87(16 July 1987); • active corruption in international commerce and passive and active corruption in the private sector, punishable under Articles 8 and 9 of Law 20/2008 (29 January 2008); • undue receipt of an advantage, passive and active corruption in the context of sports competitions, punishable under Articles 8, 9 and 10-A of Law 50/2007 (31 August 2007); • passive corruption of an individual serving in the armed forces or other military forces for the performance of an illicit action, punishable under Article 36 of Law 100/2003 (15 November 2003); and

⁹ [Chambers Global Practice Guides Anticorruption 2021](#)

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>• active corruption of an individual serving in the armed forces or other military forces, punishable under Article 37 of Law 100/2003 (15 November 2003).</p> <p>Finally, Article 372 of the Criminal Law, Article 16 of the Law on corruption of political and high public officials and Article 10-A of Law 50/2007 (31 August 2007), regarding bribery in the context of sports competitions, assert that the acceptance or offer of an undue advantage by or to a public official, political or high public official or a sports agent constitutes a criminal offence, without the requirement of an action or omission being performed in return.</p> <p>As a result of the work of the parliamentary commission on transparency, Law 52/2019, of July 31st, introduced the exclusivity obligation in the exercise of public office and the obligation to present, in a single document to be accessible online, all the income and asset declarations issued by holders of political positions and high public offices. This declaration shall also include every act and activity that may lead to incompatibilities and impediments of the holder of a political position or high public office.</p> <p>The Portuguese Council of Ministers recently approved the National Strategy to Fight Corruption ("Estratégia Nacional de Combate à Corrupção 2020-2024"). The document provides for a set of measures to be taken that shall introduce significant changes to the current criminal procedure panorama, particularly in the area of criminal liability and plea-bargaining mechanisms.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard requires compliance with anticorruption legislation (4.2.2.2). Portugal has an effective anticorruption legislation in place.</p> <p>The effectiveness of this legislation can be proven by the latest Corruption Perception Index of 2021, in which Portugal scores 62/100, that is ranking the country the number 32 out of 180.</p> <p>https://www.transparency.org/en/cpi/2021.</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>NP 4406:</p> <p>4.2.2.3 "Measures must be implemented to ensure forest protection against unauthorized and illegal activities, such as: logging, land use and other activities."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires measures against unauthorised and illegal activities of third parties (4.2.2.3).</p>
6.3.2 Legal, customary and traditional rights related to the forest land		
6.3.2.1 The standard requires that property rights, tree ownership and land tenure arrangements shall be clearly defined, documented and established for the relevant management unit. Likewise, legal,	YES	<p>NP 4406:</p> <p>4.2.3.1 "Forest area property rights, land tenure and legal and customary rights must be clearly defined, documented and respected".</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
<p>customary and traditional rights related to the forest land shall be clarified, recognised and respected.</p> <p>Note: Guidance for the handling of tenure arrangements can be obtained from the FAO Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security.</p>		<p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes a requirement for property and land tenure rights as well as legal and customary rights (4.2.3.1).</p> <p>It should be noted that the traditional rights and customary rights within the Portuguese context represent the same area of rights. Tree ownership is in Portugal covered by the property rights and as such no specific reference to the tree ownership is made in the standard.</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>	N/A	<p>Not applicable as there are no indigenous people as defined by the UN Declaration and ILO 169 in the Portugal.</p>
<p>6.3.2.3 The standard requires that forest practices and operations shall respect human rights as defined by the Universal Declaration on Human Rights.</p>	YES	<p>NP 4406:</p> <p>4.2.3.2 "Forestry practices and operations must respect human rights as defined by the Universal Declaration of Human Rights."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard requires the practices and operations to respect human rights as defined by the Universal Declaration on Human Rights. (4.2.3.2).</p>
6.3.3 Fundamental ILO conventions		
<p>6.3.3.1 The standard requires that forest practices and operations shall comply with fundamental ILO conventions.</p> <p>Note: In countries where the fundamental ILO conventions have been ratified, the requirements of 6.3.3.1 apply. In countries where a fundamental convention has not been ratified and its content is not covered by applicable legislation, specific requirements shall be included in the forest management standard.</p>	YES	<p>NP4406:</p> <p>4.2.4 "Fundamental ILO Conventions Forestry practices and operations must comply with fundamental ILO conventions"</p> <p>Portugal has ratified all 8 ILO Conventions (https://www.ilo.org/dyn/normlex/en/f?p=1000:11200:0::NO:11200:P11200_COUNTRY_ID:102815)</p> <p>Compliance: Conformity</p> <p>Justification:</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		The Standard has a specific requirement for compliance with the ILO fundamental conventions (4.2.4). In addition, Portugal has ratified all eight fundamental ILO conventions and it can be assumed that those have been implemented through the national legislation and the compliance with it is also required by the standard (4.2.2.2).
6.3.4 Health, safety and working conditions		
6.3.4.1 The standard requires that forest operations shall be planned, organised and performed in a manner that enables health and accident risks to be identified and all reasonable measures to be applied to protect workers from work-related risks. Workers shall be informed about the risks involved with their work and about preventive measures.	YES	<p>NP4406:</p> <p>4.2.5.1 “Forestry operations shall be planned, organized and carried out in a way which allows hazards’ identification and occupational risks’ assessment (work accidents and occupational diseases), as well as the application of preventive and protective measures appropriate to the work”.</p> <p>4.2.5.2 “Workers shall be trained and informed about the risks related to their work and the applicable preventive measures. Work schedule, resting periods and other working conditions shall comply with national laws or collective bargaining agreement.</p> <p>NOTE: For workers working in the certified area, shall be information, at least, about:</p> <ul style="list-style-type: none"> – occupational safety and health services organisation; – professional risk assessment; – work accident insurance; – training and information records – aptitude worksheets; – safety procedures at work; – records of forest work accidents (number and severity)”. <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard requires identification of the health and safety risks and preventions of those risks by appropriate measures (4.2.5.1). The workers shall be informed and trained against the risks (4.2.5.2).</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. Note: Guidance for specifying national standards can be obtained from the ILO Code of Good Practice: Safety and Health in Forestry Work.	YES	<p>NP4406:</p> <p>4.2.5.2 “Workers shall be trained and informed about the risks related to their work and the applicable preventive measures. Work schedule, resting periods and other working conditions shall comply with national laws or collective bargaining agreement.</p> <p>NOTE: For workers working in the certified area, shall be information, at least, about:</p> <ul style="list-style-type: none"> – occupational safety and health services organisation; – professional risk assessment; – work accident insurance; – training and information records – aptitude worksheets;

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>– safety procedures at work;</p> <p>– records of forest work accidents (number and severity)".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard requires to adopt safety measures to ensure safe working conditions. In addition, it requires compliance with national regulations and collective agreements concerning working hours and other working conditions (4.2.5.2).</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>NP4406:</p> <p>4.2.5.3 "The salary of permanent and temporary forest workers, as well as the service providers and other operators working in certified areas, shall meet at least the minimum legal standards or, when applicable, collective bargaining agreements."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard requires that the salaries shall meet or exceed the minimum legal standard or collective agreements (4.2.5.3). The requirement applies to all workers, local or migrant.</p> <p>In Portugal, the legal wages as well as the wages defined by collective agreements exceed the living wage of the country.</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>NP4406:</p> <p>4.2.5.4 "The organisation shall be committed to equal opportunity, non-discrimination and the absence of harassment in the workplace. Gender equality shall be promoted".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes a requirement for equal opportunities and non-discrimination and promotion of gender balance (4.2.5.4).</p>
7. Support		
7.1 Resources		
<p>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.</p>	YES	<p>NP4406:</p> <p>7.1 "The organisation shall determine and provide the resources needed for the establishment, implementation, maintenance and continual improvement of the sustainable forest management system, which include human, technological, financial resources, infrastructure and knowledge".</p> <p>Compliance: Conformity</p> <p>Justification:</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		The Standard requires availability of resources needed for planning, implementing, maintenance and continual improvement of actions required by the standard (5.5).
7.2 Competence		
7.2.1 The standard requires that forest managers, contractors, employees and forest owners shall be provided with sufficient information and kept up-to-date through continuous training in relation to sustainable forest management, as a precondition for all management planning and practices described in this benchmark.	YES	<p>NP4406:</p> <p>7.2 “Forest managers/owners, contractors, employees and participants shall be provided with sufficient information and kept up-to-date through continuous training regarding sustainable forest management, as a precondition for all management planning and practices described in this document.”.</p> <p>7.3 “Persons working under the organization's control must be aware of:</p> <p>a) sustainable forest management policy;</p> <p>b) its contribution to the effectiveness of the sustainable forest management system, including the benefits of performance improvement; and</p> <p>c) the implications of non-compliances with the requirements of the sustainable forest management system.”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires forest owners/managers, subcontractors, and employees to be provided with information and training regarding the sustainable forest management (7.2). In addition, all persons shall be aware of the organisation's policy, SFM requirements and implications of non-conformities (7.3).</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>NP4406:</p> <p>7.4.1 “An effective communication and consultation with local communities and other stakeholders regarding sustainable forest management shall be provided.”.</p> <p>7.4.2 “The organisation internal and external communication needs relevant to the sustainable forest management system shall be determined, including:</p> <p>a) what to communicate;</p> <p>b) when to communicate;</p> <p>c) to whom to communicate;</p> <p>d) how to communicate”.</p> <p>7.4.3 “The organisation shall provide to the CB and PEFC updated information on the certified area per year. This information should describe the nature of the certified heritage, including at least:</p> <p>a) total area and High Ecological Value forest areas;</p> <p>b) stands distribution by species; and</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>c) exploited woody and non-woody forest products”.</p> <p>7.4.4 “The organisation shall provide a public summary of the forest management plan as defined in 6.3.1.</p> <p>Information on the performance of the sustainable forest management system regarding the indicators, and their evolution over time, when available, must be publicly available, as indicated in Table 1 of Annex A.”.</p> <p>Compliance: Minor non-conformity</p> <p>Justification:</p> <p>The Standard requires effective communication and consultation with local communities and other stakeholders (7.4.1). It also defines basic principles of internal and external communication (7.4.2), communication towards the certification body and PEFC (7.4.3) and publicly available information (7.4.4).</p> <p>It should be noted that the NP 4406 standard defines requirements for both, the SFM as well as for group certification. As such the communication requirements have been harmonised with PEFC ST 1002.</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>NP4406:</p> <p>7.4.5 “Appropriate mechanisms are 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 (7.4.5).</p>
7.5 Documented Information		
7.5.1 The standard requires that the organisation's management system shall include documented information required by the standard and determined by the organisation as being necessary for the effectiveness of the sustainable forest management system.	YES	<p>NP4406:</p> <p>7.5.1 “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.</p> <p>NOTE: The documented information extent for a sustainable forest management system may differ from one organisation to another due to:</p> <p>a) the size of the organisation and the type of activities, processes, products and services;</p> <p>b) the complexity of the processes and their interactions;</p> <p>c) the competence of the people.”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires the organisation to manage documented information in relation to the size and complexity of the organisation (7.5.1).</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
7.5.2 The standard requires that the documented information is relevant, and updated as appropriate, to the activities of the organisation.	YES	<p>NP4406:</p> <p>7.5.2.2 “Documented information must be relevant, that is, up-to-date and appropriate to the organization's activities.”</p> <p>7.5.2.1 “Whenever designing and updating documented information, the organisation shall ensure adequate:</p> <ul style="list-style-type: none"> a) identification and description (a title, date, author, or reference number); b) format (language, software version, graphic appearance) and support (paper, electronic); c) review and approval in terms of relevance and adequacy.” <p>7.5.3.1 “The documented information required by the sustainable forest management system and by this standard shall be controlled in order to ensure</p> <ul style="list-style-type: none"> a) its availability and relevance for use wherever and whenever it is necessary; b) their adequate protection (loss of confidentiality or integrity, misuse)”. <p>7.5.3.2 “For documented information control, the organisation shall handle the following activities, as applicable:</p> <ul style="list-style-type: none"> a) distribution, access, recovery and use; b) storage and conservation, including preservation of legibility; c) change control (version control); d) retention and elimination”. <p>7.5.3.3 “Documented information of external origin determined necessary by the organisation for the planning and operation of the sustainable forest management system shall be identified, as appropriate, and controlled.</p> <p>7.5.3.4 “There shall be a documented information control, ensuring that outdated documents are removed and archived”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard requires relevancy and update of documented information (7.5.2.2). In addition, it defines requirements for identification (7.5.2.1) and control of the documented information (7.5.3).</p>
8. Operation		
8.1 Criterion 1: Maintenance or appropriate enhancement of forest resources and their contribution to the global carbon cycle		
8.1.1 The standard requires that management shall aim to maintain or increase forests and their ecosystem services and maintain or enhance the economic, ecological, cultural and social values of forest resources.	YES	<p>NP4406:</p> <p>“8.1.1 Management shall aim to maintain or increase forests and their ecosystem services and maintain or enhance the economic, ecological, cultural and social values of forest resources.”</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Compliance: conformity Justification: The standard requires to maintain or increase forested area, their ecosystem services, economic, social and environmental values (8.1.1).
8.1.2 The standard requires that the quantity and quality of the forest resources and the capacity of the forest to store and sequester carbon shall be safeguarded in the medium and long term by balancing harvesting and growth rates, using appropriate silvicultural measures and preferring techniques that minimise adverse impacts on forest resources.	YES	NP4406: “8.1.2 The quantity and quality of the forest resources and the capacity of the forest to store and sequester carbon shall be safeguarded in the medium and long term by balancing harvesting and growth rates, using appropriate silvicultural measures and preferring techniques that minimise adverse impacts on forest resources.” Compliance: Conformity Justification: The Standard includes requirements for maintaining the quality and quantity of forest resources by balancing harvesting and growth rates and appropriate silviculture measures (8.1.2).
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	NP4406: 8.1.3 “Climate positive practices in management operations, such as greenhouse gas emission reductions and efficient use of resources shall be encouraged.” Compliance: Conformity Justification: The standard includes requirements for climate positive practices, including efficient use of resources and reduction of greenhouse gas emissions (8.1.3).
8.1.4 The standard requires that forest conversion shall not occur unless in justified circumstances where the conversion:		
a) is in compliance with national and regional policy and legislation applicable for land use and forest management and is a result of national or regional land-use planning governed by a governmental or other official authority including consultation with affected stakeholders; and	NO	NP4406: Definitions: 3.1.18 “forest conversion Land use change, by direct human action, of forest areas to other types of land use to forest plantations”. 3.1.42 “forest plantation Stand of planted trees or resulting from seeding, with the objective of wood or non-wood products, which may include one or more of the following characteristics: reduced number of species, intensive silviculture, regular spacing or even-aged stands”. 8.1.4 “Forest conversion shall not occur unless in justified circumstances where the conversion, simultaneously: a) is in compliance with national and regional policy and legislation applicable for land use and forest management; Compliance: Minor non-conformity

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>Justification:</p> <p>The standard prohibits forest conversion and defines criteria for “justified” forest conversion.</p> <p>The definition of the term “forest plantations” is broader (stricter) than the PEFC definition as it not only refers to “stands of introduced species” but includes all stands established by planting or seeding with a limited number of species, intensive management, regular spacing or even-aged forests.</p> <p>The land-use planning and public consultation is covered by the reference to “compliance with national and regional policy and legislation applicable for land use and forest management”. The Portuguese legislation¹⁰ requires a land-use planning (Regional Forest Planning Programs – PROF, Chapter II) that is a sectoral instrument of territorial management. The PROF establishes specific rules for the use and exploitation of forest spaces to ensure sustainable production of goods and services. Since 2007, the entire territory of mainland Portugal has approved PROFs that are in force. The review of the PROFs had public and institutional participation, through the instruments provided for in the legislation.</p> <p>The minor non-conformity has been assigned based on the fact that the definition of “forest conversion” is not clear, is confusing and does not provide evidence that it also covers conversion of forests to forest plantations;</p> <p>Concerning the definition of “Forest conversion”, PEFC Portugal argues that this is a mistake in the Portuguese version of NP 4406 and that a process of introducing an amendment to the NP 4406 standard has been launched and that the definition 3.1.18 should read as follows: “forest conversion: Alteration, by direct human action, of land use from forested areas to other types of land use”. It should be noted that even this amendment would not satisfy the PEFC requirement as the term forest conversion shall cover both (i) change of forest area to other land use as well as (ii) change of forest area to forest plantations.</p>
b) entails a small proportion (no greater than 5 %) of forest type within the certified area; and	NO	<p>NP4406:</p> <p>See requirement 8.1.4a above for definitions.</p> <p>8.1.4 “Forest conversion shall not occur unless in justified circumstances where the conversion, simultaneously:</p> <p>b) entails a small proportion no greater than 5 % of forest type within the certified area;”</p> <p>Compliance: Minor non-conformity</p> <p>Justification:</p> <p>The criteria for justified circumstances of forest conversion include a scale of the conversion referring to 5 % limit (8.1.4b). However, it is not clear or evident to which time period this limitation applies. Is it 5 % for an individual conversion project, or 5 % over the validity of forest</p>

¹⁰ [Decree-Law No. 16/2009 of 14 January](#)

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>management plan, or 5 % since the adoption of this standard or 5 % since the first PEFC certification?</p> <p>PEFC Portugal argues^[54] that the issue has been widely discussed in WG1 of TC 145. PEFC Portugal claims that it requested clarification from the PEFC Council and that a response from the PEFC Council stated that “it is up to the group to decide” (20210324_PODIO_questions regarding STM ST 8.1.4., Answer A3).</p> <p>The assessor has no full access to the PODIO communication between the PEFC Council and its members and as such cannot take this into consideration, especially without access to a full wording of the response A3 presented in Podio.</p> <p>Regardless of the communication between the PEFC Council and PEFC Portugal, the 5 % surface limit without the time period is considered as ambiguous, is not auditable and does not support the overall objective of the PEFC requirement 8.1.4.</p> <p>PEFC Portugal also argues that for the purposes of demonstrating the compliance with the PEFC Council requirements^[54], it is sufficient when the national forest management standard applies the same wording as PEFC ST 1003:2018 or the same level of detail as PEFC ST 1003:2018.</p> <p>It should be noted that the minor non-conformity has been assigned taking into account the requirement 4.1b that requires the requirements of a national standard to be clear and auditable. In addition, it should be noted that the spirit of the PEFC international benchmark is to define minimum requirements that should be further developed, detailed and adapted to national conditions. Using the same text or detail as PEFC ST 1003:2018 does not meet the spirit and intention of the PEFC benchmark document.</p>
c) does not have negative impacts on ecologically important forest areas, culturally and socially significant areas, or other protected areas; and	NO	<p>NP4406:</p> <p>See requirement 8.1.4a above for definitions.</p> <p>8.1.4 “Forest conversion shall not occur unless in justified circumstances where the conversion, simultaneously:</p> <p>c) does not have negative impacts on ecologically important forest areas, culturally and socially significant areas, or other protected areas;”</p> <p>Compliance: Minor non-conformity</p> <p>Justification:</p> <p>The criteria for justified circumstances cover negative impacts on “ecologically important forest areas, culturally and socially significant areas, or other protected areas” (8.1.4c).</p> <p>The minor non-conformity statement is based on non-conforming definition of forest conversion (see 8.1.4a).</p>
d) does not destroy areas of significantly high carbon stock; and	NO	<p>NP4406:</p> <p>See requirement 8.1.4a above for definitions.</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>8.1.4 "Forest conversion shall not occur unless in justified circumstances where the conversion, simultaneously: d) does not destroy areas of significantly high carbon stock;"</p> <p>Compliance: Minor non-conformity</p> <p>Justification:</p> <p>The criteria for justified circumstances cover protection of "high carbon stock" (8.1.4d).</p> <p>The minor non-conformity statement is based on non-conforming definition of forest conversion (see 8.1.4a).</p>
e) makes a contribution to long-term conservation, economic, and social benefits.	NO	<p>NP4406:</p> <p>See requirement 8.1.4a above for definitions.</p> <p>8.1.4 "Forest conversion shall not occur unless in justified circumstances where the conversion, simultaneously: e) makes a contribution to long-term conservation, economic, and social benefits."</p> <p>Compliance: Minor non-conformity</p> <p>Justification:</p> <p>The criteria for justified circumstances cover a contribution to long-term conservation, economic, and social benefits (8.1.4e).</p> <p>The minor non-conformity statement is based on non-conforming definition of forest conversion (see 8.1.4a).</p>
8.1.5 The standard requires that afforestation of ecologically important non-forest ecosystems shall not occur unless in justified circumstances where the conversion:		
a) is in compliance with national and regional policy and legislation applicable for land use and forest management and is a result of national or regional land-use planning governed by a governmental or other official authority; and	YES	<p>NP4406:</p> <p>8.1.5 "Afforestation of ecologically important non-forest ecosystems can only occur if, simultaneously: a) is in compliance with national and regional policy and legislation applicable for land use and forest management;"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard prohibits afforestation of ecologically important non-forest areas, unless it meets the justified circumstances (8.1.5).</p> <p>One of the conditions for "justified circumstances" makes reference to the "compliance with national and regional policy and legislation applicable for land-use and forest management.</p> <p>The compliance with a land-use planning and public consultation is delivered through the referenced legislation.</p> <p>The Portuguese legislation relating to conservation of nature and biodiversity¹¹ defines framework for</p>

¹¹ [Decree-Law no. 142/2008, of July 24th, amended and republished by Decree-Law no. 242/2015, of October 15th](#)

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>classification and management of protected areas (including those of Natura 2000) and requires:</p> <ul style="list-style-type: none"> - Protection of those areas based on principles of sustainability by maintain and improving their conditions and precautionary principle with measures to avoid negative impact (Article 4); - Classification and registration of the values (Article 14, 28 and 29), - Territorial management instruments (including land-use planning and territorial plans of intermunicipal and municipal scope) shall comply with the special programmes for the protected areas (Article 14, 15 23); - Prohibits modification of the plant cover, with the exception of situations duly framed in valid planning instruments. <p>The Portuguese legislation relating to the management of Natura 2000¹² sites and species (the transposition of EU Directive 79/409/EEC and 92/43/EEC) requires:</p> <ul style="list-style-type: none"> - Spatial planning (Article 8), - Management to maintain and improve conditions of the protected species and habitats (Article 9); - Environmental impact assessment (Article 10).
b) is established based on a decision-making basis where affected stakeholders have opportunities to contribute to the decision-making on conversion through transparent and participatory consultation processes; and	YES	<p>NP4406:</p> <p>8.1.5 "Afforestation of ecologically important non-forest ecosystems can only occur if, simultaneously:</p> <p>b) is established based on a decision-making basis where affected stakeholders have opportunities to contribute to the decision-making on conversion through transparent and participatory consultation processes"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard prohibits afforestation of ecologically important non-forest areas, unless it meets the justified circumstances (8.1.5) that includes provision for transparent and participatory consultation process.</p>
c) does not have negative impacts on threatened (including vulnerable, rare or endangered) non-forest ecosystems, culturally and socially significant areas, important habitats of threatened species or other protected areas; and	YES	<p>NP4406:</p> <p>8.1.5 "Afforestation of ecologically important non-forest ecosystems can only occur if, simultaneously:</p> <p>c) does not have negative impacts on threatened natural values (including vulnerable, rare or endangered species and habitats), culturally and socially significant areas;"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard prohibits afforestation of ecologically important non-forest areas, unless it meets the justified circumstances (8.1.5) that includes provision for avoidance of negative impacts on threatened natural values, culturally and socially significant areas.</p>

¹² [Decree-Law no. 140/99, of April 24, with the wording given by Decree-Law no. 49/2005 of 4/24, having been approved in 2008, with the publication of Council of Ministers Resolution No. 115-A/2008, of 21 July](#)

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
d) entails a small proportion of the ecologically important non-forest ecosystem managed by an organisation; and	YES	<p>NP4406:</p> <p>8.1.5 "Afforestation of ecologically important non-forest ecosystems can only occur if, simultaneously:</p> <p>d) entails a small proportion of the ecologically important non-forest ecosystem managed by an organization."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard prohibits afforestation of ecologically important non-forest areas, unless it meets the justified circumstances (8.1.5) that includes provision for small proportion of the ecosystem.</p>
e) does not destroy areas of significantly high carbon stock; and	YES	<p>NP4406:</p> <p>8.1.5 "Afforestation of ecologically important non-forest ecosystems can only occur if, simultaneously:</p> <p>e) does not destroy areas of significantly high carbon stock;"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard prohibits afforestation of ecologically important non-forest areas, unless it meets the justified circumstances (8.1.5) that includes provision for avoidance of destruction of high carbon stock.</p>
f) makes a contribution to long-term conservation, economic, and social benefits.	YES	<p>NP4406:</p> <p>8.1.5 "Afforestation of ecologically important non-forest ecosystems can only occur if, simultaneously:</p> <p>f) makes a contribution to longterm conservation, economic, and social benefits."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard prohibits afforestation of ecologically important non-forest areas, unless it meets the justified circumstances (8.1.5) that includes provision for a contribution to long-term conservation, economic, and social benefits.</p>
8.1.6 The standard requires that if conversion of severely degraded forests to forest plantations is being considered, it must add economic, ecological, social and/or cultural value. Precondition of adding such value are circumstances where the conversion:		
a) is in compliance with national and regional policy and legislation applicable for land use and forest management and is a result of national or regional land-use planning governed by a governmental or other official authority; and	YES	<p>NP4406:</p> <p>Definitions</p> <p>3.1.28 "degraded forest</p> <p>Forest (3.1.27) whose characteristics may compromise in the long term the potential for carbon storage, wood, biodiversity (3.1.11) and other goods and services (definition based on FAO 2003)".</p> <p>8.1.6 "If conversion of severely degraded forests to forest plantations is being considered, it m add economic, ecological, social and/or cultural value. Precondition of</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>adding such value are circumstances where the conversion:</p> <p>a) is in compliance with national and regional policy and legislation applicable for land use and forest management;”.</p> <p>Compliance: Conformity</p> <p>The standard allows conversion of degraded forests to forest plantations with the defined criteria to be met, including compliance with national and regional policy and legislation (8.1.6). The definition of “degraded forests” is identical with the definition in PEFC ST 1003.</p> <p>The land-use planning, respectively forest related plans, is defined in the law on planning, management and intervention plans¹³ that requires:</p> <ul style="list-style-type: none"> - Regional forest management planning (PROF) that links directly all public entities and also individuals in relation to elaboration of forest management plans, the rules of interventions in forests and limits to areas occupied by eucalyptus (Chapter II), - Forest management plans prepared and approved by the INCF that are mandatory for public and community forests and for private forests of certain size (as defined by PROF), (Chapter III), - Forest interventions plans for specific forest properties not covered by the forest management plans approved by the ICNF (Chapter IV). <p>Observation:</p> <p>The text of 8.1.6 is missing a word “must”. As such the sentence is missing fundamental part and is not auditable. However, PEFC Portugal confirmed that this is a mistake in the translation from the official Portuguese version that will be used for the conformity assessment purposes and that includes the work “must” (deve).</p>
b) is established based on a decision-making basis where affected stakeholders have opportunities to contribute to the decision-making on conversion through transparent and participatory consultation processes; and	YES	<p>NP4406:</p> <p>8.1.6 “If conversion of severely degraded forests to forest plantations is being considered, it m add economic, ecological, social and/or cultural value. Precondition of adding such value are circumstances where the conversion:</p> <p>b) is established based on a decision-making basis where affected stakeholders have opportunities to contribute to the decision-making on conversion through”.</p> <p>Compliance: Conformity</p> <p>The standard allows conversion of degraded forests to forest plantations with the defined criteria to be met, including stakeholders consultation.</p>
c) has a positive impact on long-term carbon sequestration capacity of forest vegetation; and	YES	<p>NP4406:</p> <p>8.1.6 “If conversion of severely degraded forests to forest plantations is being considered, it m add economic,</p>

¹³ [Decree-Law No. 16/2009 of 14 January](#)

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>ecological, social and/or cultural value. Precondition of adding such value are circumstances where the conversion:</p> <p>c) has a positive impact on long-term forest carbon sequestration capacity;".</p> <p>Compliance: Conformity</p> <p>The standard allows conversion of degraded forests to forest plantations with the defined criteria to be met, including positive impacts on carbon sequestration (8.1.6c).</p>
d) does not have negative impacts on ecologically important forest areas, culturally and socially significant areas, or other protected areas; and	YES	<p>NP4406:</p> <p>8.1.6 "If conversion of severely degraded forests to forest plantations is being considered, it m add economic, ecological, social and/or cultural value. Precondition of adding such value are circumstances where the conversion:</p> <p>d) does not have negative impacts on ecologically important forest areas, culturally and socially significant areas, or other protected areas;".</p> <p>Compliance: Conformity</p> <p>The standard allows conversion of degraded forests to forest plantations with the defined criteria to be met, including avoidance of negative impacts on ecologically important forest areas, culturally and socially significant areas, or other protected areas (8.1.6d).</p>
e) safeguards protective functions of forests for society and other regulating or supporting ecosystem services; and	YES	<p>NP4406:</p> <p>8.1.6 "If conversion of severely degraded forests to forest plantations is being considered, it m add economic, ecological, social and/or cultural value. Precondition of adding such value are circumstances where the conversion:</p> <p>e) safeguard the forests protecting functions and other ecosystem services".</p> <p>Compliance: Conformity</p> <p>The standard allows conversion of degraded forests to forest plantations with the defined criteria to be met, including safeguards for protective functions or supporting ecosystem services (8.1.6e).</p>
f) safeguards socio-economic functions of forests, including the recreational function and aesthetic values of forests and other cultural services; and	YES	<p>NP4406:</p> <p>8.1.6 "If conversion of severely degraded forests to forest plantations is being considered, it m add economic, ecological, social and/or cultural value. Precondition of adding such value are circumstances where the conversion:</p> <p>f) safeguard the forests socio-economic function;".</p> <p>Compliance: Conformity</p> <p>The standard allows conversion of degraded forests to forest plantations with the defined criteria to be met, including socio-economic safeguards (8.1.6f). It is assumed that the recreational and cultural values are</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		covered by both, ecosystem services (8.1.6e) as well as socio-economic functions(8.1.6f).
g) has a land history providing evidence that the degradation is not the consequence of deliberate poor forest management practices; and	YES	<p>NP4406:</p> <p>8.1.6 "If conversion of severely degraded forests to forest plantations is being considered, it must add economic, ecological, social and/or cultural value. Precondition of adding such value are circumstances where the conversion:</p> <p>g) has a land history providing evidence that the degradation is not the consequence of deliberate poor forest management practices;"</p> <p>Compliance: Conformity</p> <p>The standard allows conversion of degraded forests to forest plantations with the defined criteria to be met, including the fact that the degradation is not the consequence of deliberate poor forest management practices (8.1.6g).</p>
h) is based on credible evidence demonstrating that the area is neither recovered nor in the process of recovery.	YES	<p>NP4406:</p> <p>8.1.6 "If conversion of severely degraded forests to forest plantations is being considered, it must add economic, ecological, social and/or cultural value. Precondition of adding such value are circumstances where the conversion:</p> <p>h) demonstrates that the area is neither recovered nor in the process of recovery.</p> <p>Compliance: Conformity</p> <p>The standard allows conversion of degraded forests to forest plantations with the defined criteria to be met, including the fact that the area is neither recovered nor in the process of recovery (8.1.6h).</p>
8.2 Criterion 2: Maintenance of forest ecosystem health and vitality		
8.2.1 The standard requires that health and vitality of forest ecosystems shall be maintained or enhanced and degraded forest ecosystems shall be rehabilitated wherever and as far as economically feasible, by making best use of natural structures and processes and using preventive biological measures.	YES	<p>NP4406:</p> <p>8.2.1 "Health and vitality of forest ecosystems shall be maintained or enhanced. Degraded forest ecosystems shall be rehabilitated wherever and as far as economically feasible, by making best use of natural structures and processes and using preventive biological measures."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements relating to maintenance and enhancement of forest health and vitality and rehabilitation of degraded ecosystems (8.2.1).</p>
8.2.2 The standard requires that adequate genetic, species and structural diversity shall be encouraged or maintained to enhance the stability, vitality and resilience of the forests to adverse environmental factors and strengthen natural regulation mechanisms.	YES	<p>NP4406:</p> <p>8.2.2 "Species and structural genetic diversity shall be encouraged or maintained to enhance the stability, vitality and resilience of the forests to adverse environmental factors and strengthen natural regulation mechanisms."</p> <p>Compliance: Conformity</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Justification: The standard requires genetic, species and structural diversity of forests (8.2.2).
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	NP4406: 8.2.3 The use of fire shall be limited to regions where fire is an essential tool in forest management for regeneration, wildfire protection and habitat management. In these cases adequate management and control measures shall be taken." Compliance: Conformity Justification: The Standard includes requirements restricting the use of fires in forest management (8.2.3). The standard does not make reference to indigenous peoples practices as there are no indigenous peoples (as defined by ILO 169 or the UN Declaration) in Portugal.
8.2.4 The standard requires that appropriate forest management practices such as reforestation and afforestation with tree species and provenances that are suited to the site conditions or the use of tending, harvesting and transport techniques that minimise tree and/or soil damages shall be applied.	YES	NP4406: 8.2.4 "In (re)afforestation forest management best practices shall be used through the use of species and provenances suited to local conditions, and shall be adopted management, harvesting and transport methods that minimize damage to trees or soil." Compliance: Conformity Justification: The standard includes requirements for usage of site suited species in reforestation and afforestation and minimisation of damages to trees and to the forest cover (8.2.4).
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	NP4406: 8.2.5 "Waste disposal 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". 8.2.6 "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." Compliance: Conformity Justification: The standard includes requirements for disposal of waste and for avoidance of spillage of oil or fuel (8.2.5, 8.2.6).
8.2.6 The standard requires that integrated pest management, appropriate silviculture alternatives and other biological measures shall be preferred to minimise the use of pesticides.	YES	NP4406: 8.2.7 "Pest management shall be done using integrated pest management in order to minimise the use of pesticides" Compliance: Conformity Justification:

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		The Standard includes requirements for integrated pest management and minimisation of the pesticides usage (8.2.7).
8.2.7 The standard requires that any use of pesticides is documented.	YES	<p>NP4406:</p> <p>8.2.8 "The use of pesticides is documented."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for records on the pesticides usage (8.2.8).</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>NP4406:</p> <p>"8.2.9 The use of WHO Class 1A and 1B pesticides is prohibited. Other highly toxic pesticides shall be prohibited, except where no other viable alternative is available."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>Prohibits WHO 1A and 1B pesticides and other highly toxic pesticides. No exemption is allowed for WHO 1A and 1B pesticides (8.2.9).</p> <p>Observation</p> <p>The PEFC Portugal Checklist indicates that the WHO 1A and 1B substances are not allowed by the European legislation. This statement is not correct as many European countries allow usage of some WHO 1A and 1B pesticides.</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 Convention on Persistent Organic Pollutants.</p>	YES	<p>NP4406:</p> <p>8.2.10 "Pesticides, such as chlorinated hydrocarbons whose derivatives remain biologically active and accumulate in the food chain beyond their intended use, and any pesticides banned by international agreement, shall be prohibited.</p> <p>NOTE: "Pesticides banned by international agreements" are defined in the Stockholm Convention on Persistent Organic Pollutants."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard prohibits the use of chlorinated hydrocarbons and those banned by international agreement (8.2.10).</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>NP4406:</p> <p>8.2.11 "The use of pesticides shall follow the instructions given by the pesticide producer and be implemented with proper equipment by trained personnel."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for proper use and proper equipment for the pesticides usage (8.2.11).</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
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>NP4406:</p> <p>8.2.12 “If fertilisers are used, they shall be applied in a controlled manner and with due consideration for the environment. Fertilizer use shall not be an alternative to appropriate soil nutrient management”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires controlled use of fertilisers and prohibits the fertilisers to be used as an alternative to soil nutrient management (8.2.12).</p>
8.3 Criterion 3: Maintenance and encouragement of productive functions of forests (wood and non-wood)		
8.3.1 The standard requires that the capability of forests to produce a range of wood and non-wood forest products and services on a sustainable basis shall be maintained.	YES	<p>NP4406:</p> <p>8.3.1 The capability of forests to produce a range of wood and non-wood forest products and services on a sustainable basis shall be maintained”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard includes requirements to maintain production capability of forests for both wood and non-wood products (8.3.1).</p>
8.3.2 The standard requires that sound economic performance shall be pursued, taking into account possibilities for new markets and economic activities in connection with all relevant goods and services of forests.	YES	<p>NP4406:</p> <p>8.3.2 “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.”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard includes requirements for sound economic performance, consideration of new markets and economic activities (8.3.2).</p>
8.3.3 The standard requires that management, harvesting and regeneration operations shall be carried out at a time, and in a way, that does not reduce the productive capacity of the site, for example by avoiding damage to soil and retained stands and trees.	YES	<p>NP4406:</p> <p>8.3.3 “Management, harvesting and regeneration operations shall be carried out at a time, and in a way, that does not reduce the productive capacity of the site, for example by avoiding damage to soil and retained stands and trees.”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard includes requirements that forest operation shall not reduce the productive capacity and shall not damage soil, water and remaining vegetation (8.3.3).</p>
8.3.4 The standard requires that harvesting levels of both wood and non-wood forest products shall not exceed a rate that can be sustained in the long term, and optimum use shall be made of the harvested products.	YES	<p>NP4406:</p> <p>8.3.4 “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.”</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Compliance: Conformity Justification: The standard requires a long-term sustainability of wood and non-wood forest products harvesting (8.3.4).
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	NP4406: 8.3.5 "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." Compliance: Conformity Justification: The standard includes requirements for building forest infrastructure with minimisation of impacts on the environment (8.3.5)
8.4 Criterion 4: Maintenance, conservation and appropriate enhancement of biological diversity in forest ecosystems		
8.4.1 The standard requires that management planning shall aim to maintain, conserve or enhance biodiversity on landscape, ecosystem, species and genetic levels.	YES	NP4406: 8.4.1 "Management planning shall aim to maintain, conserve or enhance biodiversity on landscape, ecosystem, species and genetic levels." Compliance: Conformity Justification: The Standard includes requirements for conservation, maintenance and enhancement of biodiversity at on landscape, ecosystem, species and genetic levels (8.4.1).
8.4.2 The standard requires that inventory, mapping and planning of forest resources shall identify, protect, conserve or set aside ecologically important forest areas. Note: This does not prohibit forest management activities that do not damage the important ecologic values of those biotopes.	YES	NP4406: 3.1.7 "ecologically important forest areas Forest areas: a) containing threatened (3.1.25) (including vulnerable or rare) or representative natural values (species and habitats); or b) containing significant concentrations of endemic species and habitats of threatened species, as defined in Natura 2000 lists and classification; or c) containing in situ endangered or protected genetic resources; or d) contributing to global, regional and national landscapes, with natural abundance and distribution of common species". 8.4.2 "Inventory, mapping and planning of forest resources shall identify, protect, conserve or set aside ecologically important forest areas. NOTE: Forest management activities that do not damage the important ecological values of these biotopes are allowed." Compliance: Conformity Justification:

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		The standard requires to identify and protect ecologically important forest areas (8.4.2). The definition of this term (3.1.7) is compatible with the PEFC Council's definition of the ecologically important forest areas (PEFC ST 1003:2018, 3.5).
<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>NP4406:</p> <p>8.4.3 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: This requirement do not prevent trade in species complying with CITES requirements."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard exploitation of threatened and protected species for commercial purposes (8.4.3).</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>NP4406:</p> <p>8.4.4 Successful regeneration shall be ensured through natural regeneration or planting that is adequate to ensure the quantity and quality of the forest resources."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard includes requirements for successful regeneration, being either natural regeneration or planting (8.4.4).</p>
<p>8.4.5 The standard requires that for reforestation and afforestation origins of native species that are well-adapted to site conditions shall be preferred. Only those introduced species, provenances or varieties shall be used whose impacts on the ecosystem and on the genetic integrity of native species and local provenances have been scientifically evaluated, and if negative impacts can be avoided or minimised.</p> <p>Note: CBD (Convention on Biological Diversity) Guiding Principles for the Prevention, Introduction, and Mitigation of Impacts of Alien Species that Threaten Ecosystems, Habitats or Species are recognised as guidance for avoidance of invasive species.</p>	YES	<p>NP4406:</p> <p>8.4.5 "For reforestation and afforestation origins of native species that are well-adapted to site conditions shall be preferred. Other species, provenances or varieties should only be introduced if:</p> <ul style="list-style-type: none"> • the impacts on the ecosystem and on the genetic integrity of native species and local provenances have been scientifically evaluated, and • the negative impacts can be avoided or minimised. <p>NOTE: CBD Guiding Principles are recognised as guidance for avoidance of invasive species."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard includes requirements for the usage of native species and restrictions concerning the use of introduced specie, including evaluation of their impacts (8.4.5).</p>
<p>8.4.6 The standard requires that afforestation, reforestation and other tree planting activities that contribute to the</p>	YES	<p>NP4406:</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
improvement and restoration of ecological connectivity shall be promoted.		8.4.6 "Afforestation, reforestation and other tree planting activities that contribute to the improvement and restoration of ecological connectivity shall be promoted." Compliance: Conformity Justification: The standard requires that planting activities shall contribute to the improvement of ecological connectivity. (8.4.6).
8.4.7 The standard requires that genetically-modified trees shall not be used. Note: The restriction on the usage of genetically-modified trees has been adopted by the PEFC General Assembly based on the Precautionary Principle. Until enough scientific data on genetically modified trees indicates that impacts on human and animal health and the environment are equivalent to, or more positive than, those presented by trees genetically improved by traditional methods, no genetically-modified trees will be used.	YES	NP4406: 8.4.7 "Genetically-modified trees shall not be used." NOTE: The restriction on the usage of genetically-modified trees has been adopted by the PEFC General Assembly based on the Precautionary Principle." Compliance: Conformity Justification: The standard requires prohibition of the GMO material in planting (8.4.7).
8.4.8 The standard requires that a diversity of both horizontal and vertical structures and the diversity of species such as mixed stands shall be promoted, where appropriate. The practices shall also aim to maintain or restore landscape diversity.	YES	NP4406: 8.4.8 "Diversity of both horizontal and vertical structures and the diversity of species such as mixed stands shall be promoted, where appropriate. The practices shall also aim to maintain or restore landscape diversity." Compliance: Conformity Justification: The standard includes requirements promoting horizontal and vertical diversity of forest stands and maintenance or restoration of landscape diversity (8.4.8).
8.4.9 The standard requires that traditional management practices that create valuable ecosystems on appropriate sites shall be supported, where appropriate.	YES	NP4406: 8.4.9 "Traditional management practices that create valuable ecosystems on appropriate sites shall be supported, where appropriate." Compliance: Conformity Justification: The standard requires support to traditional management practices (8.4.9). Observation The wording "where appropriate" is vague and ambiguous and decreases a level of clarity in the implementation and auditing process.
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	YES	NP4406: 8.4.10 Managing and harvesting operations shall be conducted in a way that does not cause lasting damage to

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
possible, practical measures shall be taken to maintain or improve biological diversity.		<p>ecosystems. Wherever possible, practical measures shall be taken to maintain or improve biodiversity.”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard requires forest management operations that do not cause lasting damages to ecosystems (8.4.10).</p>
8.4.11 The standard requires that infrastructure shall be planned and constructed in a way that minimizes damage to ecosystems, especially to rare, sensitive or representative ecosystems and genetic reserves, and that takes threatened or other key species – in particular their migration patterns – into consideration.	YES	<p>NP4406:</p> <p>8.4.11 “Infrastructure shall be planned and constructed in a way that:</p> <ul style="list-style-type: none"> • minimises damage to ecosystems, especially to rare, sensitive or representative ecosystems and genetic reserves; and • takes threatened or other key species into consideration, in particular their migration patterns (if applicable).” <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard includes requirements building and maintaining forest infrastructure, and minimisation of its negative impacts on biodiversity (8.4.11).</p>
8.4.12 The standard requires that, with due regard to management objectives, measures shall be taken to control the pressure of animal populations on forest regeneration and growth as well as on biodiversity.	YES	<p>NP4406:</p> <p>8.4.12 “With due regard to management objectives, measures shall be taken to control the pressure of animal populations on forest regeneration and growth as well as on biodiversity.”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard includes requirements for control of damages caused by animal population (8.4.12).</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>NP4406:</p> <p>8.4.13 “Standing and fallen dead wood, hollow trees, old groves and rare tree species shall be left in quantities and distribution necessary to safeguard biodiversity, taking into account the potential effect on the health and stability of forests and on surrounding ecosystems. Fire risk and people and property safety shall also be taken into account.”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard includes requirements for dead wood and other biodiversity features (8.4.13). The requirement also refers to the risks of wildfires that shall be taken into consideration when implementing the requirement.</p>
8.5 Criterion 5: Maintenance or appropriate enhancement of protective functions in forest management (notably soil and water)		
8.5.1 The standard requires that protective functions of forests for society, such as their potential role in erosion control, flood prevention, water purification, climate	YES	<p>NP4406:</p> <p>8.5.1 “Protective functions of forests for society, such as their potential role in erosion control, flood prevention,</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
regulation, carbon sequestration and other regulating or supporting ecosystem services shall be maintained or enhanced.		<p>water purification, climate regulation, carbon sequestration and other regulating or supporting ecosystem services shall be maintained or enhanced.”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard includes requirements for protection of sites with protective functions for society (8.5.1).</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>NP4406:</p> <p>8.5.2 “Areas that fulfil specific and recognised protective functions for society shall be mapped. Forest management plans and operations shall ensure the maintenance or enhancement of these functions.”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard includes requirements for identification and mapping of forests with protective functions (8.5.2).</p>
8.5.3 The standard requires that special care shall be given to forestry operations on sensitive soils and erosion-prone areas as well as in areas where operations might lead to excessive erosion of soil into watercourses. Techniques applied and the machinery used shall be suitable for such areas. Special measures shall be taken to minimise the pressure of animal populations on these areas.	YES	<p>NP4406:</p> <p>8.5.3 “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.”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard includes requirements for protection of soil against erosion on sensitive soils, usage of machinery and control of animal populations (8.5.3).</p>
8.5.4 The standard requires that special care shall be given to forestry operations in forest areas with water protection functions to avoid adverse effects on the quality and quantity of water resources. Inappropriate use of chemicals or other harmful substances or inappropriate silvicultural practices influencing water quality in a harmful way shall be avoided. Downstream water balance and water quality shall not be significantly affected by the operations.	YES	<p>NP4406:</p> <p>8.5.4 “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 silviculture practices influencing water quality in a harmful way shall be avoided. Downstream water balance and water quality shall not be significantly affected by the operations.”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard includes requirements for protection of quality and quantity of water resources (8.5.4).</p>
8.5.5 The standard requires that construction of roads, bridges and other infrastructure shall be carried out in a manner that minimises bare soil exposure, avoids the introduction of soil into watercourses and preserves the natural level and function of water courses and	YES	<p>NP4406:</p> <p>8.5.5 “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.”</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
river beds. Proper road drainage facilities shall be installed and maintained.		Compliance: Conformity Justification: The standard includes requirements for forest infrastructure and its impacts on soil and water (8.5.5).
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	NP4406: 8.6.1 "Forest management planning shall aim to respect all socio-economic functions of forests." Compliance: Conformity Justification: The standard includes requirements to respect socio-economic functions of forests (8.6.1).
8.6.2 The standard requires that adequate public access to forests for the purpose of recreation shall be provided, taking into account respect for ownership rights, safety and the rights of others, the effects on forest resources and ecosystems, as well as compatibility with other functions of the forest.	YES	NP4406: 8.6.2 "Adequate public access to forests for the purpose of recreation shall be provided, taking into account respect for ownership rights, safety and the rights of others, the effects on forest resources and ecosystems, as well as compatibility with other functions of the forest." Compliance: Conformity Justification: The standard ensures public access to forests and defines cases where the public access can be restricted (8.6.2).
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	NP4406: 8.6.3 Sites with recognised specific historical, cultural or spiritual significance and areas fundamental to 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." Compliance: Conformity Justification: The standard requires protection of sites with historical, spiritual and cultural significance (8.6.3). The requirement does not include reference to indigenous people as those are not present in Portugal.
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.	N/A	NP4406: 8.6.4 "Forest management shall promote the long-term health and well-being of communities within or adjacent to the forest management area, supported by engagement with local communities." Compliance: Not applicable Justification: The Standard includes requirements supporting local communities (8.6.4) and their engagement. The requirement does not include reference to indigenous people as those are not present in Portugal.

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
8.6.5 The standard requires that the best use shall be made of forest-related experience and traditional knowledge, innovations and practices such as those of forest owners, NGOs, local communities, and indigenous peoples. Equitable sharing of the benefits arising from the utilization of such knowledge shall be encouraged.	YES	<p>NP4406:</p> <p>8.6.5 “Forest management shall make the best use of forest-related experience and traditional knowledge, innovations and practices such as those of forest owners, NGOs, local communities. Equitable sharing of the benefits arising from the utilization of such knowledge shall be encouraged.”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard requires the best use shall be made of forest-related experience and traditional knowledge, innovations and practices such as those of forest owners, NGOs and local communities, including sharing of benefits from the knowledge utilisation (8.6.5). The requirement does not include reference to indigenous people as those are not present in Portugal.</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>NP4406:</p> <p>8.6.6 “Forest 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.”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard requires to support local economy, training and employment of local people (8.6.6). The requirement does not include reference to indigenous people as those are not present in Portugal.</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>NP4406:</p> <p>8.6.7 “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.”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard includes requirements promoting research activities and data collection (8.6.7).</p> <p>Observation</p> <p>The wording “as appropriate” is vague and ambiguous and decreases a level of clarity in the implementation and auditing process.</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>NP4406:</p> <p>9.1.3 “Forest resources monitoring and their management assessment should be done periodically. These results</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
performed, and results fed back into the planning process.		shall be fed back into the planning process, including environmental, social and economic impacts.” Compliance: Conformity Justification: The standard includes requirement for monitoring of forest resources and review as an integral part of the planning process (9.1.1).
9.1.2 The standard requires that health and vitality of forests shall be periodically monitored, especially key biotic and abiotic factors that potentially affect health and vitality of forest ecosystems, such as pests, diseases, overgrazing and overstocking, fire, and damage caused by climatic factors, air pollutants or by forest management operations.	YES	NP4406: 9.1.4 “Health and vitality of forests shall be periodically monitored, especially key biotic and abiotic factors that potentially affect forest ecosystems’ health and vitality, such as pests, diseases, overgrazing and overstocking, fire and damage caused by climatic factors, air pollutants or by forest management operations.” Compliance: Conformity Justification: The standard includes requirement for monitoring of health and vitality of forest resources (9.1.4).
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	NP4406: 9.1.5 “Where it is the responsibility of the forest owner/manager and included in forest management certificate, the economic activities’ regarding non-wood forest products, including hunting and fishing, shall be monitored and controlled.” Compliance: Conformity Justification: The standard requires monitoring of non-wood forest products (9.1.3).
9.1.4 The standard requires that working conditions shall be regularly monitored and adapted as necessary.	YES	NP4406: 9.1.6 “Working conditions shall be regularly monitored and adapted as necessary.” Compliance: Conformity Justification: The standard requires regular monitoring of the working conditions (9.1.6).
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		
a) conforms to • the organisation’s requirements for its management system; • the requirements of the national sustainable forest management standard	YES	NP4406: 9.2.1 “Objectives The organisation shall perform internal audits at planned intervals to provide information on whether the FMS: a) complies with:

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		i. the organisation's own requirements for its forest management system; ii. this document's requirements;" Compliance: Conformity Justification: The standard includes requirements for internal audit that are satisfying the PEFC requirements.
b) is effectively implemented and maintained.	YES	NP4406: 9.2.1 b) is effectively implemented and maintained." Compliance: Conformity Justification: The standard includes requirements for internal audit that are satisfying the PEFC requirement.
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	NP4406: 9.2.2 "The organization shall 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;" Compliance: Conformity Justification: The standard includes requirements for internal audit that are satisfying the PEFC requirements.
b) define the audit criteria and scope for each audit;	YES	NP4406: 9.2.2 "The organization shall ...b) define the audit criteria and scope for each audit" Compliance: Conformity Justification: The standard includes requirements for internal audit that are satisfying the PEFC requirements.
c) select the auditors and conduct audits to ensure objectivity and the impartiality of the audit process;	YES	NP4406: 9.2.2 "The organization shall ... c) select the auditors and perform audits to ensure objectivity and the impartiality of the audit process. Whoever performs the internal audit shall not evaluate their own work and shall have forestry and standard competences;" Compliance: Conformity Justification: The standard includes requirements for internal audit that are satisfying the PEFC requirements.

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
d) ensure that the results of the audits are reported to relevant management;	YES	<p>NP4406:</p> <p>9.2.2 “The organization shall ... d) ensure that the audits results are reported to the relevant management responsible according to the functions/units audited and to any other appropriate individuals; and”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard (PCSN I) includes requirements for internal audit that are satisfying the PEFC requirements.</p>
e) retain documented information as evidence of the implementation of the audit programme and the audit results.	YES	<p>NP4406:</p> <p>9.2.2 “The organization shall ... 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 internal audit that are satisfying 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>NP4406:</p> <p>9.3.1 Top management shall carry out an annual review of the organisation's sustainable forest management system, to ensure its continued relevance, adequacy and effectiveness. The top management review should take into account:</p> <p>a) the status of actions from previous management reviews;”...</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard includes requirements for management review that are satisfying the PEFC requirements.</p>
b) changes in external and internal issues that are relevant to the management system;	YES	<p>NP4406:</p> <p>9.3.1 Top management shall carry out an annual review of the organisation's sustainable forest management system, to ensure its continued relevance, adequacy and effectiveness. The top management review should take into account:</p> <p>b) changes in external and internal issues that are relevant to the management system;”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard includes requirements for management review that are satisfying the PEFC requirements.</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
<p>c) information on the organisation's performance, including trends in:</p> <ul style="list-style-type: none"> • nonconformities and corrective actions; • monitoring and measurement results; • audit results; 	YES	<p>NP4406:</p> <p>9.3.1 Top management shall carry out an annual review of the organisation's sustainable forest management system, to ensure its continued relevance, adequacy and effectiveness. The top management review should take into account:"</p> <p>c) information on the organisation's performance, including trends in:</p> <ul style="list-style-type: none"> i. nonconformities and corrective actions; ii. monitoring and measurement results; and iii. audit results;"... <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard includes requirements for management review that are satisfying the PEFC requirements.</p>
d) opportunities for continual improvement	YES	<p>NP4406:</p> <p>9.3.1 Top management shall carry out an annual review of the organisation's sustainable forest management system, to ensure its continued relevance, adequacy and effectiveness. The top management review should take into account:"</p> <p>d) opportunities for continual improvement;"...</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard includes requirements for management review that are satisfying the PEFC requirements.</p>
9.3.2 The standard requires that the outputs of the management review shall include decisions related to continual improvement opportunities and any need for changes to the management system.	YES	<p>NP4406:</p> <p>9.3.2 "Outputs of the management review shall include decisions related to continual improvement opportunities and any changes needed to the forest management system."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard includes requirements for management review that are satisfying the PEFC requirements.</p>
9.3.3 The standard requires that documented information as evidence of the results of management reviews shall be retained.	YES	<p>NP4406:</p> <p>9.3.3 "Documented information shall be retained by the organisation as evidence of the results of management reviews."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard includes requirements for management review that are satisfying the PEFC requirements.</p>
10. Improvement		

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
10.1 Nonconformity and corrective action		
10.1.1 The standard requires that when a nonconformity occurs, the organisation shall:		
a) react to the nonconformity and, as applicable: i. take action to control and correct it; ii. deal with the consequences;	YES	NP4406: 10.1.1 "When a nonconformity occurs, the organisation shall: a) react to the nonconformity and, as applicable: i. take action to control and correct it; ii. deal with the consequences;" Compliance: Conformity Justification: The standard includes requirements for management of non-conformities that are satisfying the PEFC requirements.
b) evaluate the need for action to eliminate the causes of the nonconformity, in order that it does not recur or occur elsewhere, by: i. reviewing the nonconformity; ii. determining the causes of the nonconformity; iii. determining if similar nonconformities exist, or could potentially occur;	YES	NP4406: 10.1.1 "When a nonconformity occurs, the organisation shall: b) evaluate the need for action to eliminate the causes of the nonconformity, in order that it does not recur or occur elsewhere, by: i. reviewing the nonconformity; ii. determining the causes of the nonconformity; iii. determining if similar nonconformities exist, or could potentially occur". Compliance: Conformity Justification: The standard includes requirements for management of non-conformities that are satisfying the PEFC requirements.
c) implement any action needed;	YES	NP4406: 10.1.1 "When a nonconformity occurs, the organisation shall: c) implement any action needed;" Compliance: Conformity Justification: The standard includes requirements for management of non-conformities that are satisfying the PEFC requirements.
d) review the effectiveness of any corrective action taken;	YES	NP4406: 10.1.1 "When a nonconformity occurs, the organisation shall: d) review the effectiveness of any corrective action taken;" Compliance: Conformity

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Justification: The standard includes requirements for management of non-conformities that are satisfying the PEFC requirements.
e) make changes to the management system, if necessary.	YES	NP4406: 10.1.1 "When a nonconformity occurs, the organisation shall: e) make changes to the management system, if necessary." Compliance: Conformity Justification: The standard includes requirements for management of non-conformities that are satisfying the PEFC requirements.
10.1.2 The standard requires that corrective actions shall be appropriate to the effects of the nonconformities encountered.	YES	NP4406: 10.1.2 "Corrective actions shall be appropriate to the effects of the nonconformities encountered." Compliance: Conformity Justification: The standard includes requirements for management of non-conformities that are satisfying the PEFC requirements.
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	NP4406: 10.1.3 The organisation shall retain documented information as evidence of: a) the nature of the nonconformities and any subsequent actions taken;" Compliance: Conformity Justification: The standard includes requirements for management of non-conformities that are satisfying the PEFC requirements.
b) the results of any corrective action.	YES	NP4406: 10.1.3 The organisation shall retain documented information as evidence of: b) the results of any corrective action." Compliance: Conformity Justification: The standard includes requirements for management of non-conformities that are satisfying the PEFC requirements.
10.2 Continual improvement	YES	NP4406:

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
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>The organisation shall continually improve the suitability, adequacy and effectiveness of the sustainable forest management system.”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard includes requirements for continuous improvement.</p>

Annex D: Detailed assessment of the Trees outside Forests

This checklist covers requirements for sustainable forest management as defined in PEFC ST 1003:2018, Sustainable Forest Management – Requirements, taking into account amended wording as outlined in its Appendix 2: Guidelines for the interpretation of requirements for Trees outside Forests (TOF), B, C and E.

NP 4406 makes a general requirement that all requirements for sustainable forest management, Section 4 - 10 (as applied for forests) also apply to the management of ToF with additional or amended requirements specified in Annex C of NP 4406. The term “forest” used in NP 4406 shall therefore be interpreted as ToF.

Section 2 - Normative references and Section 3 - Acronyms, terms and definitions are applied in full.

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	NP 4406: 4.4.1 “The organisation shall establish, implement, maintain and continuously improve a sustainable forest management system, including the necessary processes and their interactions, in accordance with the requirements of this standard, appropriate to the applicable level: individual, group, regional: a) meet the performance requirements of this document to ensure that all are met in a long-term perspective”. Compliance: Conformity Justification: The standard includes management and performance-based requirements that are applicable at individual group or regional levels.
b) be clear, performance based and auditable;	YES	NP 4406: 4.4.1 “The organisation shall establish, implement, maintain and continuously improve a sustainable forest management system, including the necessary processes and their interactions, in accordance with the requirements of this standard, appropriate to the applicable level: individual, group, regional: 4.4.1 b) be clear and auditable”. Compliance: Conformity Justification: The standard requires that the implemented management system shall be clear and auditable. The requirements of the standard are considered as clear and auditable.
c) apply to activities of all forest operators in the defined forest area who have an	YES	NP 4406:

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
impact on achieving compliance with the requirements;		<p>4.4.1 "The organisation shall establish, implement, maintain and continuously improve a sustainable forest management system, including the necessary processes and their interactions, in accordance with the requirements of this standard, appropriate to the applicable level: individual, group, regional:</p> <p>c) be suitable for agents with activities in the defined certified area, which have an impact on compliance with the requirements;"</p> <p>Compliance: Minor non-conformity</p> <p>Justification:</p> <p>The standard explicitly states that "the management system shall be "suitable" for agents with activities in the defined forest area". However, this wording does not ensure the objective of the PEFC requirement 4.1c that all operators in the defined forest area shall comply with the Standard.</p> <p>PEFC Portugal argues that the wording "shall be suitable to" is equivalent to "shall apply to".</p> <p>However, the meaning of the word "suitable" is "acceptable" or "right to someone or something"¹⁴ and synonyms to this word would be "appropriate to" or "fitting to".</p> <p>In contrary, the wording "apply" refers to "to relate to" or "to make use of something"¹⁵.</p> <p>Within the context of PEFC ST 1003, the wording "the management system shall be suitable to all agents" is not the same as "the management system shall apply to all agents".</p>
d) require record-keeping that provides evidence of compliance with the requirements of the forest management standards;	YES	<p>NP 4406:</p> <p>4.4.1 "The organisation shall establish, implement, maintain and continuously improve a sustainable forest management system, including the necessary processes and their interactions, in accordance with the requirements of this standard, appropriate to the applicable level: individual, group, regional:</p> <p>d) ensure records maintenance that provide evidence of compliance with the standard."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard requires to maintain records as evidence of compliance with the standard (4.4.1d).</p>
<p>e) specify "100% PEFC certified", or another system specific claim, as claim to be used to communicate the origin of products in an area covered by the standard to customers with a PEFC chain of custody;</p> <p>Note: System specific claims of PEFC endorsed standards and PEFC Council</p>	YES	<p>NP 4406:</p> <p>4.4.1 "...Each sale of a certified product shall be supported by an invoice or equivalent accounting document, which specifies:</p> <p>7) the PEFC claim recognized by the applicable certification system".</p>

¹⁴ [SUITABLE | English meaning - Cambridge Dictionary](#)

¹⁵ [APPLY | English meaning - Cambridge Dictionary](#)

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
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>3.1.4 "PEFC claim</p> <p>Organisation (3.1.37) information on materials/products, declared in the sales and delivery documentation.</p> <p>NOTE 1: The above definition applies within PEFC ST 2002:2020 Standard scope.</p> <p>NOTE 2: The "100% PEFC certified" or other system-specific claim, shall be specified to demonstrate to PEFC chain-of-custody customers that products are originated from a certified area.</p> <p>NOTE 3: The specific claims of the standards system recognized by PEFC, the abbreviations of such claims approved by the PEFC Council, the claim "100% PEFC certified" and their translation into languages other than English are published on the PEFC website www.pefc.org.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard states that the sales documentation shall include "PEFC claim recognized by the applicable certification system" (4.4.2). The definition of the term "PEFC claim" makes reference to the claim "100 % PEFC certified" or other system-specific claim recognised by the PEFC Council (3.1.4).</p>
f) require that where owners/managers of forests are selling products from areas other than covered by the standard, only products from areas covered by the standard are sold with the claim "100% PEFC-certified" or a system specific claim;	YES	<p>NP 4406:</p> <p>4.4.3 "The organization shall ensure that only products from the certified area are sold with a "100% PEFC certified" claim or with a system specific PEFC claim."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires that the usage of the PEFC claim "100% PEFC certified" is only allowed for products sourced from the certified area (4.4.3).</p>
g) require that claims on the origin of products in an area covered by the standard are only made by forest owners/managers covered by a PEFC recognised certificate issued against the standard;	YES	<p>NP 4406:</p> <p>4.4.4 "The organization shall ensure that the products' origin claims of certified area are made only by holders of a recognized PEFC certificate".</p> <p>4.4.5 "Only for invoicing and if the certificate holder intends to authorize the invoice to be issued in another person or entity name, this must be documented, legally authorized and approved by the certificate holder."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires that the PEFC claim shall only be used for products originating in the certified area (4.4.4). An exemption I made for situation where invoicing or sale is made by another person that is authorised by the certificate holder (4.4.5). This situation should for example apply to sales within family relatives. This exemptional arrangement still guarantees that only timber from certified area can be sold with the PEFC claim.</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
h) specify requirements concerning the information which need to be provided to a PEFC chain of custody certified customer;	YES	<p>NP 4406:</p> <p>4.4.2 "The organization shall have documentation which describes the products selling process, including its control and registration. Each sale of a certified product must be supported by an invoice or equivalent accounting document, which specifies:</p> <ol style="list-style-type: none"> 1) buyer's identification; 2) supplier's identification; 3) products' identification according to the PEFC categories; 4) products' quantity (eg volume, weight); 5) sale's date or period; 6) product's origin (estate identification); 7) the PEFC claim recognized by the applicable certification system; and 8) organization's PEFC recognized certificate code.". <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard defines information that shall be provided to customers for products originating from the certified area (4.4.2).</p> <p>The information complies with PEFC ST 2002:2020 (PEFC international CoC standard).</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>All requirements of PEFC ST 1003(except those listed under identified non-conformities) are satisfied directly by NP4406.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The NP 4406 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>NP 4406:</p> <p>4.2.1 "The organization shall determine:</p> <ol style="list-style-type: none"> a) the affected stakeholders that are relevant to the sustainable forest management;". <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires to identify affected stakeholders (4.2.1a).</p>
b) the relevant needs and expectations of these stakeholders.	YES	<p>NP 4406:</p> <p>4.2.1 "The organization shall determine:</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>b) the relevant needs and expectations of these stakeholders".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires to identify relevant needs and expectations of the identified stakeholders (4.2.1b).</p>
4.3 Determining the scope of the management system		
4.3.1 The standard requires that the organisation shall determine the boundaries and applicability of the management system to establish its scope.	YES	<p>NP 4406:</p> <p>4.3.1 "The organisation shall determine the boundaries and applicability of the management system to establish its scope. In determining this scope, the organization shall consider:</p> <p>a) the external and internal matters referred to in Section 4.1;</p> <p>b) the requirements referred to in Section 4.2;</p> <p>c) the applicable level: individual, group, regional.</p> <p>The scope should be available as documented information identifying woody and non-woody products."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard requires identification of the scope of the management system (4.3.1).</p>
4.3.2 The standard requires that forest management shall comprise the cycle of inventory and planning, implementation, monitoring and evaluation, and shall include an appropriate assessment of the social, environmental and economic impacts of forest management practices. This shall form a basis for a cycle of continuous improvement.	YES	<p>NP 4406:</p> <p>4.3.2 "The forest management shall comprise planning, implementation, monitoring and evaluation (cycle PDCA), and shall include an appropriate assessment of the social, environmental and economic impacts of forest management practices. This information shall form the basis for a cycle of continuous improvement."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard requires the cycle of planning, implementation, monitoring and evaluation (PDCA cycle) and an appropriate assessment of social, environmental and economic impacts (4.3.2).</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>NP 4406:</p> <p>5.1 "Top management (or the organisation, if delegated) shall demonstrate leadership and commitment to the sustainable forest management system by:</p> <p>a) ensuring that the policy and sustainable forest management objectives establishment and their compatibility with the organisation's strategic orientation;</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>b) ensure sustainable forest management system's requirements integration in the organisation's business processes;</p> <p>c) ensure the necessary resources for the sustainable forest management system are available;</p> <p>d) communicate the importance of effective sustainable forest management and its compliance with the sustainable forest management system requirements;</p> <p>e) ensure that the sustainable forest management system achieves the intended results;</p> <p>f) guide and support people to contribute to the effectiveness of the sustainable forest management system;</p> <p>g) promote continuous improvement;</p> <p>h) to demonstrate their leadership support other relevant management functions, applicable to the extent of their respective areas of responsibility".</p> <p>5.2.1 Top management shall establish a sustainable forest management policy that:</p> <p>a) is suitable for the organisation's purpose;</p> <p>b) provide a framework for defining sustainable forest management objectives;</p> <p>c) includes a commitment to meet applicable requirements, and</p> <p>d) include a commitment to sustainable forest management system continuous improvement."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires the commitment to comply with the applicable scheme requirements and to continuously improve the SFM (5.2.1).</p>
b) to continuously improve the sustainable forest management system.	YES	<p>See 5.1.a</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires the commitment to comply with the applicable scheme requirements and to continuously improve the SFM (5.2.1).</p>
5.2 The standard requires that this commitment shall be publicly available.	YES	<p>NP 4406:</p> <p>5.2.2 "Sustainable forest management policy shall be:</p> <p>a) made available as documented information;</p> <p>b) communicated within the organisation; and</p> <p>c) made available as appropriate to stakeholders".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires a publicly available commitment/policy (5.2.2).</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
5.3 The standard requires that responsibilities for sustainable forest management shall be clearly defined and assigned.	YES	<p>NP 4406:</p> <p>5.3.1 "Top management must ensure that for roles that are relevant within the organization responsibilities and authorities are assigned and communicated.</p> <p>Top management must assign responsibility and authority to:</p> <p>a) ensure that the sustainable forest management system complies with the requirements of this document, and</p> <p>b) report to top management the performance of the sustainable forest management system".</p> <p>5.3.2 "Sustainable forest management responsibilities within the organization must be clearly defined and assigned".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires to identify and assign responsibilities for the SFM and for management system (5.3.1, 5.3.2).</p>
6. Planning		
6.1 Actions to address risks and opportunities		
6.1.1 The standard requires that the organisation shall consider risks and opportunities concerning compliance with the requirements for sustainable forest management. Size and scale of the operations of the organisation shall be considered.	YES	<p>NP 4406:</p> <p>6.1.1 When planning a sustainable forest management system, the organisation shall consider the issues referred to in 4.1, 4.2 and Section 8 and determine the risks and opportunities that shall be addressed to:</p> <p>a) provide guarantees that the sustainable forest management system can achieve the intended results;</p> <p>b) prevent or reduce unwanted effects;</p> <p>c) excluded areas;</p> <p>d) achieve continuous improvement".</p> <p>6.1.2 "The organisation shall plan:</p> <p>a) actions to address these risks and opportunities, and</p> <p>b) how to:</p> <p>i. integrate and implement actions in the processes of the sustainable forest management system</p> <p>ii. evaluate the effectiveness of these actions".</p> <p>6.1.3 "The organisation shall consider risks and opportunities concerning compliance with the requirements for sustainable forest management. Size and scale of the operations of the organisation shall be considered".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires to identify risk and opportunities, including consideration of size and scale of operations and</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		plan actions addressing those risks and opportunities (6.1.1-6.1.3)
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>NP 4406:</p> <p>6.1.4 "Inventory and mapping of forest resources, biodiversity and habitat (including protected or threatened and endemic species) shall be established and maintained, adequate to local and national conditions and in correspondence with the requirements described in this international benchmark standard".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires inventory and mapping of forest resources (6.1.4).</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>NP 4406:</p> <p>6.3 "The sustainable forest management plan shall: a) elaborated and periodically updated or continually adjusted;"</p> <p>In addition to 6.3, C6.3.1 also requires that "The management plan shall: b) include the forestry and arboriculture guidelines and recommended models in the legislation or other regulations applicable at the local scale (TOF)".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires elaboration and periodic revision of forest management plans (6.3a).</p>
b) appropriate to the size and use of the forest area;	YES	<p>NP 4406:</p> <p>6.3 "The sustainable forest management plan shall: b) appropriate to the size and use of the certified area;"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires the forest management plans to be appropriate to the size and used of forest area (6.3b).</p>
c) based on applicable local, national and international legislation as well as existing land-use or other official plans; and	YES	<p>NP 4406:</p> <p>6.3 "The sustainable forest management plan shall: c) comply with legislation, as well as other planning instruments, in particular the planning legal regime, management and intervention programs and plans for the forestry sector;"</p> <p>Compliance: Conformity</p> <p>Justification:</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		The Standard requires compliance of the forest management planning with legal requirements (6.3c).
d) adequately covering forest resources.	YES	<p>NP 4406:</p> <p>6.3 "The sustainable forest management plan shall: d) adequately cover forest resources;"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires the forest management plans to be adequately cover forest resources. (6.3d).</p>
6.2.2 The standard requires that management plans shall take into account the different uses or functions of the managed forest area.	YES	<p>NP 4406:</p> <p>6.3 "The sustainable forest management plan shall: e) take into account the different uses or functions of the certified area;"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires the forest management plans to take into account the different uses or functions of forests. (6.3e).</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>NP 4406:</p> <p>6.3 "The sustainable forest management plan shall: g) include at least a description of the current certified area, long-term objectives, and the average annual allowable cut, plan, including its justification;"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires the forest management plans to include at least description of the current certified area, long-term objectives, and the average annual allowable cut, plan, including its justification (6.3f).</p>
6.2.4 The standard requires that the annually allowable use of non-wood forest products shall be included in the management plan where forest management covers commercial use of non-wood forest products at a level which can have an impact on their long-term sustainability.	N/A	<p>NP 4406:</p> <p>6.3 "The sustainable forest management plan shall: h) define the annual allowed use of non-woody forest products, if there is commercial use by forest management at a level that could compromise their long-term sustainability;"</p> <p>Compliance: Not applicable</p> <p>Justification:</p> <p>The Standard requires the forest management plans to include sustainable use of non-wood forest products. (6.3h).</p>
6.2.5 The standard requires that management plans specify ways and	YES	<p>NP 4406:</p> <p>6.3 "The sustainable forest management plan shall:</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
means to minimise the risk of degradation and damage to forest ecosystems.		<p>i) define measures to minimize the risk of degradation and damage to forest ecosystems;“.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires the forest management plans to define measures to minimize the risk of degradation and damage to forest ecosystems (6.3i).</p>
6.2.6 The standard requires that management plans shall take into account the results of scientific research.	YES	<p>NP 4406:</p> <p>6.3 “The sustainable forest management plan shall:</p> <p>j) consider the results of scientific research, monitoring and emergency and disaster situations, with an impact on the certified area.”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires the forest management plans to take into account the results of scientific research but also the results of monitoring, emergencies and calamity situations (6.3j).</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>NP 4406:</p> <p>6.3.1 “A summary of the management plan shall be publicly available and include at least a description of the current area under management and information on the long-term objectives, respecting the confidentiality of the information”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard require public availability of forest management plans (6.3.1) while respecting confidentiality of the information.</p>
6.2.8 The standard requires that the publicly available summary of the management plan may exclude confidential business and personal information and other information made confidential by applicable legislation or for the protection of cultural sites or sensitive natural resource features.	YES	<p>NP 4406:</p> <p>6.3.1 “...Information on business activity and personal data, as well as other information confidential by legislation or for the protection of places of cultural value or sensitive natural resources, may be excluded.”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard allows that any commercially sensitive information, personal data, information confidential by legislation and required by nature protection objectives to be excluded from publication (6.3.1).</p>
6.3 Compliance requirements		
6.3.1 Legal compliance		
6.3.1.1 The standard requires that the organisation shall identify and have access	YES	NP 4406:

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
<p>to the legislation applicable to its ToF management and determine how these compliance obligations apply to the organisation.</p> <p>Note: For a country which has signed a FLEGT Voluntary Partnership Agreement (VPA) between the European Union and the producing country, the "legislation applicable to forest management" is defined by the VPA agreement.</p>		<p>4.2.2.1 "The organization must identify and have access to applicable legislation within the framework of the sustainable forest management system and determine how these legal obligations apply to the organization.</p> <p>NOTE: Annex D of this document identifies the sources of information on which the organization can be guided."</p> <p>C.4.2.2.2 "In addition to the disposed in Section 4.2.2.2 of this standard, the organisation shall comply with the legislation applicable to the TOF management, agricultural and agroforestry practices".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires identification of the relevant regulations (4.2.2.1).</p> <p>The FLEGT Voluntary Partnership Agreement (VPA) is not applicable to Portugal and is therefore not referenced in the standard.</p>
<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 forest management practices; nature and environmental protection; protected and endangered species; property, tenure and land-use rights for indigenous peoples, local communities or other affected stakeholders; health, labour and safety issues; anti-corruption and the payment of applicable royalties and taxes.</p>	YES	<p>NP 4406:</p> <p>4.2.2.2 "The organisation shall comply with local, national and international legislation applicable to forest management, including that to forest management practices; protection of environment and nature; protected and endangered species; ownership, tenure and use rights by local communities or other affected stakeholders; labour, health and safety, anti-corruption issues and the payment of applicable legal obligations".</p> <p>4.2.2.4 If conflicts between laws, regulations, treaties and international agreements are identified, the organisation shall demonstrate the application of measures to resolve them."</p> <p>C.4.2.2.2 "In addition to the disposed in Section 4.2.2.2 of this standard, the organisation shall comply with the legislation applicable to the TOF management, agricultural and agroforestry practices".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires identification of the relevant regulations and defines areas of the applicable legislation that is complying with the PEFC requirement (4.2.2.2).</p> <p>In Portugal, there are no Indigenous Peoples as defined by the United Nations Declaration(https://www.un.org/esa/socdev/unpfii/documents/DRIPS_en.pdf), therefore they were not mentioned in the standard.</p>
<p>6.3.1.3 The standard requires that where no anti-corruption legislation exists, the organisation must take alternative anti-</p>	YES	<p>Portuguese legislation recognises the following basic offences in the area of bribery and corruption¹⁶:</p>

¹⁶ [Chambers Global Practice Guides Anticorruption 2021](#)

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
corruption measures appropriate to the risk of corruption.		<ul style="list-style-type: none"> • undue receipt of an advantage by a public official, punishable under Article 372 of the Criminal Code; • passive and active corruption in the public sector, punishable under Articles 373 and 374 of the Criminal Code; • undue receipt of an advantage by a political or high public official, punishable under Article 16 of Law 34/87 (16 July 1987); • passive and active corruption of political and high public officials, punishable under Articles 17 and 18 of Law 34/87(16 July 1987); • active corruption in international commerce and passive and active corruption in the private sector, punishable under Articles 8 and 9 of Law 20/2008 (29 January 2008); • undue receipt of an advantage, passive and active corruption in the context of sports competitions, punishable under Articles 8, 9 and 10-A of Law 50/2007 (31 August 2007); • passive corruption of an individual serving in the armed forces or other military forces for the performance of an illicit action, punishable under Article 36 of Law 100/2003 (15 November 2003); and • active corruption of an individual serving in the armed forces or other military forces, punishable under Article 37of Law 100/2003 (15 November 2003). <p>Finally, Article 372 of the Criminal Law, Article 16 of the Law on corruption of political and high public officials and Article 10-A of Law 50/2007 (31 August 2007), regarding bribery in the context of sports competitions, assert that the acceptance or offer of an undue advantage by or to a public official, political or high public official or a sports agent constitutes a criminal offence, without the requirement of an action or omission being performed in return.</p> <p>As a result of the work of the parliamentary commission on transparency, Law 52/2019, of July 31st, introduced the exclusivity obligation in the exercise of public office and the obligation to present, in a single document to be accessible online, all the income and asset declarations issued by holders of political positions and high public offices. This declaration shall also include every act and activity that may lead to incompatibilities and impediments of the holder of a political position or high public office.</p> <p>The Portuguese Council of Ministers recently approved the National Strategy to Fight Corruption (“Estratégia Nacional de Combate à Corrupção 2020-2024”). The document provides for a set of measures to be taken that shall introduce significant changes to the current criminal procedure panorama, particularly in the area of criminal liability and plea-bargaining mechanisms.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard requires compliance with anticorruption legislation (4.2.2.2). Portugal has an effective anticorruption legislation in place.</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		The effectiveness of this legislation can be proven by the latest Corruption Perception Index of 2021, in which Portugal scores 62/100, that is ranking the country the number 32 out of 180. https://www.transparency.org/en/cpi/2021 .
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	NP 4406: 4.2.2.3 "Measures must be implemented to ensure forest protection against unauthorized and illegal activities, such as: logging, land use and other activities." Compliance: Conformity Justification: The Standard requires measures against unauthorised and illegal activities of third parties (4.2.2.3).
6.3.2 Legal, customary and traditional rights related to the forest land		
6.3.2.1 The standard requires that property rights, tree ownership and land tenure arrangements shall be clearly defined, documented and established for the relevant management unit. Likewise, legal, customary and traditional rights related to the forest land shall be clarified, recognised and respected. Note: Guidance for the handling of tenure arrangements can be obtained from the FAO Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security.	YES	NP 4406: 4.2.3.1 "Forest area property rights, land tenure and legal and customary rights must be clearly defined, documented and respected". Compliance: Conformity Justification: The Standard includes a requirement for property and land tenure rights as well as legal and customary rights (4.2.3.1). It should be noted that the traditional rights and customary rights within the Portuguese context represent the same area of rights. Tree ownership is in Portugal covered by the property rights and as such no specific reference to the tree ownership is made in the standard.
6.3.2.2 The standard requires that forest practices and operations shall be conducted in recognition of the established framework of legal, customary and traditional rights such as outlined in ILO 169 and the UN Declaration on the Rights of Indigenous Peoples, which shall not be infringed upon without the free, prior and informed consent of the holders of the rights, including the provision of compensation where applicable. Where the extent of rights is not yet resolved, or is in dispute, there are processes for just and fair resolution. In such cases forest managers shall, in the interim, provide meaningful opportunities for parties to be engaged in forest management decisions whilst respecting the processes and roles and responsibilities laid out in the policies and laws where the certification takes place.	N/A	Not applicable as there are no indigenous people as defined by the UN Declaration and ILO 169 in the Portugal.

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
6.3.2.3 The standard requires that forest practices and operations shall respect human rights as defined by the Universal Declaration on Human Rights.	YES	<p>NP 4406:</p> <p>4.2.3.2 “Forestry practices and operations must respect human rights as defined by the Universal Declaration of Human Rights.”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard requires the practices and operations to respect human rights as defined by the Universal Declaration on Human Rights. (4.2.3.2).</p>
6.3.3 Fundamental ILO conventions		
<p>6.3.3.1 The standard requires that forest practices and operations shall comply with fundamental ILO conventions.</p> <p>Note: In countries where the fundamental ILO conventions have been ratified, the requirements of 6.3.3.1 apply. In countries where a fundamental convention has not been ratified and its content is not covered by applicable legislation, specific requirements shall be included in the forest management standard.</p>	YES	<p>NP4406:</p> <p>4.2.4 “Fundamental ILO Conventions Forestry practices and operations must comply with fundamental ILO conventions”</p> <p>Portugal has ratified all 8 ILO Conventions (https://www.ilo.org/dyn/normlex/en/f?p=1000:11200:0::N0:11200:P11200_COUNTRY_ID:102815)</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard has a specific requirement for compliance with the ILO fundamental conventions (4.2.4). In addition, Portugal has ratified all eight fundamental ILO conventions and it can be assumed that those have been implemented through the national legislation and the compliance with it is also required by the standard (4.2.2.2).</p>
6.3.4 Health, safety and working conditions		
6.3.4.1 The standard requires that forest operations shall be planned, organised and performed in a manner that enables health and accident risks to be identified and all reasonable measures to be applied to protect workers from work-related risks. Workers shall be informed about the risks involved with their work and about preventive measures.	YES	<p>NP4406:</p> <p>4.2.5.1 “Forestry operations shall be planned, organized and carried out in a way which allows hazards’ identification and occupational risks’ assessment (work accidents and occupational diseases), as well as the application of preventive and protective measures appropriate to the work”.</p> <p>4.2.5.2 “Workers shall be trained and informed about the risks related to their work and the applicable preventive measures. Work schedule, resting periods and other working conditions shall comply with national laws or collective bargaining agreement.</p> <p>NOTE: For workers working in the certified area, shall be information, at least, about:</p> <ul style="list-style-type: none"> – occupational safety and health services organisation; – professional risk assessment; – work accident insurance; – training and information records – aptitude worksheets; – safety procedures at work; – records of forest work accidents (number and severity)”.

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Compliance: Conformity Justification: The standard requires identification of the health and safety risks and preventions of those risks by appropriate measures (4.2.5.1). The workers shall be informed and trained against the risks (4.2.5.2).
<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	NP4406: 4.2.5.2 “Workers shall be trained and informed about the risks related to their work and the applicable preventive measures. Work schedule, resting periods and other working conditions shall comply with national laws or collective bargaining agreement. NOTE: For workers working in the certified area, shall be information, at least, about: – occupational safety and health services organisation; – professional risk assessment; – work accident insurance; – training and information records – aptitude worksheets; – safety procedures at work; – records of forest work accidents (number and severity)”. Compliance: Conformity Justification: The standard requires to adopt safety measures to ensure safe working conditions. In addition, it requires compliance with national regulations and collective agreements concerning working hours and other working conditions (4.2.5.2).
<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	NP4406: 4.2.5.3 “The salary of permanent and temporary forest workers, as well as the service providers and other operators working in certified areas, shall meet at least the minimum legal standards or, when applicable, collective bargaining agreements.” Compliance: Conformity Justification: The standard requires that the salaries shall meet or exceed the minimum legal standard or collective agreements (4.2.5.3). The requirement applies to all workers, local or migrant. In Portugal, the legal wages as well as the wages defined by collective agreements exceed the living wage of the country.
6.3.4.4 The standard requires that the organisation is committed to equal opportunities, non-discrimination and	YES	NP4406: 4.2.5.4 “The organisation shall be committed to equal opportunity, non-discrimination and the absence of

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
freedom from workplace harassment. Gender equality shall be promoted.		harassment in the workplace. Gender equality shall be promoted". Compliance: Conformity Justification: The Standard includes a requirement for equal opportunities and non-discrimination and promotion of gender balance (4.2.5.4).
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	NP4406: 7.1 "The organisation shall determine and provide the resources needed for the establishment, implementation, maintenance and continual improvement of the sustainable forest management system, which include human, technological, financial resources, infrastructure and knowledge". Compliance: Conformity Justification: The Standard requires availability of resources needed for planning, implementing, maintenance and continual improvement of actions required by the standard (5.5).
7.2 Competence		
7.2.1 The standard requires that forest managers, contractors, employees and forest owners shall be provided with sufficient information and kept up-to-date through continuous training in relation to sustainable forest management, as a precondition for all management planning and practices described in this benchmark.	YES	NP4406: 7.2 "Forest managers/owners, contractors, employees and participants shall be provided with sufficient information and kept up-to-date through continuous training regarding forestry and arboriculture in rural an urban areas, as a precondition for all management planning and practices described in this standard." 7.3 "Persons working under the organization's control must be aware of: a) sustainable forest management policy; b) its contribution to the effectiveness of the sustainable forest management system, including the benefits of performance improvement; and c) the implications of non-compliances with the requirements of the sustainable forest management system." C.7.2 "Competence Forest managers/owners, contractors, employees and participants shall be provided with sufficient information and kept up-to-date through continuous training regarding forestry and arboriculture in rural an urban areas, as a precondition for all management planning and practices described in this standard".

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Compliance: Conformity Justification: The Standard requires forest owners/managers, subcontractors, and employees to be provided with information and training regarding the sustainable forest management (7.2). In addition, all persons shall be aware of the organisation's policy, SFM requirements and implications of non-conformities (7.3).
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	NP4406: 7.4.1 "An effective communication and consultation with local communities and other stakeholders regarding sustainable forest management shall be provided." 7.4.2 "The organisation internal and external communication needs relevant to the sustainable forest management system shall be determined, including: a) what to communicate; b) when to communicate; c) to whom to communicate; d) how to communicate". 7.4.3 "The organisation shall provide to the CB and PEFC updated information on the certified area per year. This information should describe the nature of the certified heritage, including at least: a) total area and High Ecological Value forest areas; b) stands distribution by species; and c) exploited woody and non-woody forest products". C.7.4.3 "The organisation shall provide to the CB and PEFC updated information on the TOF certified area per year as described in Section 7.4.3 of this standard." 7.4.4 "The organisation shall provide a public summary of the forest management plan as defined in 6.3.1. Information on the performance of the sustainable forest management system regarding the indicators, and their evolution over time, when available, must be publicly available, as indicated in Table 1 of Annex A." Compliance: Conformity Justification: The Standard requires effective communication and consultation with local communities and other stakeholders (7.4.1). It also defines basic principles of internal and external communication (7.4.2), communication towards the certification body and PEFC (7.4.3) and publicly available information (7.4.4). It should be noted that the NP 4406 standard defines requirements for both, the SFM as well as for group certification. As such the communication requirements have been harmonised with PEFC ST 1002.

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
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>NP4406:</p> <p>C.7.4.5 “Appropriate mechanisms are in place for resolving complaints and disputes relating to forest management operations in TOF areas, land use rights and work conditions.”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes provisions for handling complaints and disputes (7.4.5).</p>
7.5 Documented Information		
7.5.1 The standard requires that the organisation’s management system shall include documented information required by the standard and determined by the organisation as being necessary for the effectiveness of the sustainable forest management system.	YES	<p>NP4406:</p> <p>7.5.1 “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.</p> <p>NOTE: The documented information extent for a sustainable forest management system may differ from one organisation to another due to:</p> <ul style="list-style-type: none"> a) the size of the organisation and the type of activities, processes, products and services; b) the complexity of the processes and their interactions; c) the competence of the people.”. <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires the organisation to manage documented information in relation to the size and complexity of the organisation (7.5.1).</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>NP4406:</p> <p>7.5.2.2 “Documented information must be relevant, that is, up-to-date and appropriate to the organization's activities.”</p> <p>7.5.2.1 “Whenever designing and updating documented information, the organisation shall ensure adequate:</p> <ul style="list-style-type: none"> a) identification and description (a title, date, author, or reference number); b) format (language, software version, graphic appearance) and support (paper, electronic); c) review and approval in terms of relevance and adequacy.” <p>7.5.3.1 “The documented information required by the sustainable forest management system and by this standard shall be controlled in order to ensure</p> <ul style="list-style-type: none"> a) its availability and relevance for use wherever and whenever it is necessary;

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>b) their adequate protection (loss of confidentiality or integrity, misuse)".</p> <p>7.5.3.2 "For documented information control, the organisation shall handle the following activities, as applicable:</p> <p>a) distribution, access, recovery and use;</p> <p>b) storage and conservation, including preservation of legibility;</p> <p>c) change control (version control);</p> <p>d) retention and elimination".</p> <p>7.5.3.3 "Documented information of external origin determined necessary by the organisation for the planning and operation of the sustainable forest management system shall be identified, as appropriate, and controlled.</p> <p>7.5.3.4 "There shall be a documented information control, ensuring that outdated documents are removed and archived".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard requires relevancy and update of documented information (7.5.2.2). In addition, it defines requirements for identification (7.5.2.1) and control of the documented information (7.5.3).</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>NP4406:</p> <p>C.8.1.1 "TOF areas management objectives should maintain or increase the coverage rate, tree value or diversity at the landscape and their ecosystem services in order to improve the economic, ecological, cultural and social values of the resources and that are aligned with current land uses.</p> <p>NOTE: For TOF areas, when it is not possible to fulfil this requirement at the individual level, it can be considered at the landscape level."</p> <p>Compliance: conformity</p> <p>Justification:</p> <p>The standard requires to maintain or increase coverage rate, tree value or diversity, their ecosystem services, economic, social and environmental values (8.1.1).</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>NP4406:</p> <p>"C.8.1.2 The quantity and quality of TOF resources and its capacity to store and sequester carbon shall be safeguarded in the medium and long term by balancing harvesting and growth rates, using appropriate measures and preferring techniques that minimise adverse impacts on ecosystem resources.</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>NOTE: For TOF areas, when it is not possible to fulfil this requirement at the individual level, it can be considered at the landscape level."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for maintaining the quality and quantity of ToF resources by balancing harvesting and growth rates and appropriate silviculture measures (8.1.2).</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>NP4406:</p> <p>8.1.3 "Climate positive practices in management operations, such as greenhouse gas emission reductions and efficient use of resources shall be encouraged."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard includes requirements for climate positive practices, including efficient use of resources and reduction of greenhouse gas emissions (8.1.3).</p>
8.1.4 The standard requires that forest conversion to ToF shall not occur unless in justified circumstances.		
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>NP4406:</p> <p>TOF areas resulting from a conversion after December 31, 2010 are not eligible for certification except in the circumstances described above."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard does not make TOF established by forest conversion after 31.12.2010 eligible for PEFC certification.</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>		
TOF areas established by a conversion of ecological important non-forest ecosystems after 31 December 2010 in other than "justified circumstances" do not meet the requirement and are not eligible for certification.	NO	<p>NP4406:</p> <p>C.8.1.5 "Conversion of ecologically important non-forest ecosystems to TOF shall only take place in justified circumstances, simultaneously:</p> <p>a) is in compliance with national and regional policy and legislation applicable for land use and forest management;</p> <p>b) is established based on a decision-making basis where affected stakeholders have opportunities to contribute to the decision-making on conversion through transparent and participatory consultation processes;</p> <p>c) does not have negative impacts on threatened natural values (including vulnerable, rare or endangered species and habitats), culturally and socially significant areas;</p> <p>d) entails a small proportion of the ecologically important non-forest ecosystem managed by an organisation;</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>e) does not destroy areas of significantly high carbon stock;</p> <p>f) makes a contribution to long-term conservation, economic, and social benefits.</p> <p>Compliance: Minor non-conformity</p> <p>Justification:</p> <p>The standard prohibits afforestation of ecologically important non-forest areas and their conversion to ToF (C.8.1.5).</p> <p>The minor non-conformity has been assigned based on two elements:</p> <ul style="list-style-type: none"> a) The standard does not require that ToF areas established by a conversion of ecologically important non-forest ecosystems after 31.12.2010 are not eligible for PEFC certification. The NOTE to C.8.1.4 applies to conversion from forests to ToF rather than from the ecologically important non-forest ecosystems. b) The standard does not provide definition of the term “ecologically important non-forest area”. <p>The obligation to define the definition for the term “ecologically important non-forest area” is established by the PEFC Council Board of Directors interpretation of the ToF requirements and their assessment (see chapter 6).</p> <p>PEFC Portugal has provided response to this non-conformity that the omission of the date under the requirement 8.1.5 (respectively C8.1.5) was a mistake that will be corrected following the IPQ processes for introduction of amendments.</p>
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>NP4406:</p> <p>C.8.2.1 “Health and vitality of TOF areas shall be maintained or enhanced and degraded areas shall be rehabilitated as far as feasible, by making best use of landscape characteristics, the natural structures and processes (egg close-to-nature forestry) and using preventive biological measures.”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements relating to maintenance and enhancement of forest health and vitality and rehabilitation of degraded ecosystems (8.2.1).</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>NP4406:</p> <p>C.8.2.2 “Species and structural genetic diversity shall be encouraged or maintained to enhance the stability, vitality and resilience of the TOF areas.”</p> <p>Compliance: Conformity</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Justification: The standard requires genetic, species and structural diversity of forests (C.8.2.2).
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	NP4406: 8.2.3 The use of fire shall be limited to regions where fire is an essential tool in forest management for regeneration, wildfire protection and habitat management. In these cases adequate management and control measures shall be taken." Compliance: Conformity Justification: The Standard includes requirements restricting the use of fires in forest management (8.2.3). The standard does not make reference to indigenous peoples practices as there are no indigenous peoples (as defined by ILO 169 or the UN Declaration) in Portugal.
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	NP4406: C.8.2.4 "TOF management best practices shall be used through the use of species and provenances suited to local conditions, and shall be adopted management, harvesting and transport methods that minimize damage to trees or soil." Compliance: Conformity Justification: The standard includes requirements for usage of site suited species in planting and minimisation of damages to trees and to the forest cover (C8.2.4).
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	NP4406: 8.2.5 "Waste disposal 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". 8.2.6 "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." Compliance: Conformity Justification: The Standard includes requirements for disposal of waste and for avoidance of spillage of oil or fuel (8.2.5, 8.2.6).
8.2.6 The standard requires that integrated pest management, appropriate silviculture alternatives and other biological measures shall be preferred to minimise the use of pesticides.	YES	NP4406: 8.2.7 "Pest management shall be done using integrated pest management in order to minimise the use of pesticides" Compliance: Conformity Justification:

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		The Standard includes requirements for minimisation of the pesticides usage (8.2.7).
8.2.7 The standard requires that any use of pesticides is documented.	YES	<p>NP4406:</p> <p>8.2.8 “The use of pesticides is documented.”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for records on the pesticides usage (8.2.8).</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>NP4406:</p> <p>“8.2.9 The use of WHO Class 1A and 1B pesticides is prohibited. Other highly toxic pesticides shall be prohibited, except where no other viable alternative is available.”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>Prohibits WHO 1A and 1B pesticides and other highly toxic pesticides. No exemption is allowed for WHO 1A and 1B pesticides.</p> <p>Observation</p> <p>The PEFC Portugal Checklist indicates that the WHO 1A and 1B substances are not allowed by the European legislation. This statement is not correct as many European countries allow usage of some WHO 1A and 1B pesticides (8.2.9).</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 Convention on Persistent Organic Pollutants.</p>	YES	<p>NP4406:</p> <p>8.2.10 “Pesticides, such as chlorinated hydrocarbons whose derivatives remain biologically active and accumulate in the food chain beyond their intended use, and any pesticides banned by international agreement, shall be prohibited.</p> <p>NOTE: “Pesticides banned by international agreements” are defined in the Stockholm Convention on Persistent Organic Pollutants.”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard prohibits the use of chlorinated hydrocarbons and those banned by international agreement (8.2.10).</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>NP4406:</p> <p>8.2.11 “The use of pesticides shall follow the instructions given by the pesticide producer and be implemented with proper equipment by trained personnel.”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for proper use and proper equipment for the pesticides usage (8.2.11).</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
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>NP4406:</p> <p>8.2.12 “If fertilisers are used, they shall be applied in a controlled manner and with due consideration for the environment. Fertilizer use shall not be an alternative to appropriate soil nutrient management”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires controlled use of fertilisers and prohibits the fertilisers to be used as an alternative to soil nutrient management (8.2.12).</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 products, non-wood forest products and/or services from trees on a sustainable basis shall be maintained.	YES	<p>NP4406:</p> <p>“C.8.3.1 The capability of TOF areas to produce a range of wood and non-wood forest products and services on a sustainable basis shall be maintained.”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard includes requirements to maintain production capability for both wood and non-wood products (C.8.3.1).</p>
8.3.2 The standard requires that sound economic performance shall be pursued, taking into account possibilities for new markets and economic activities in connection with all relevant goods and services of forests.	YES	<p>NP4406:</p> <p>C.8.3.2 “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 TOF areas.”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard includes requirements for sound economic performance, consideration of new markets and economic activities (C.8.3.2).</p>
8.3.3 The standard requires that management, harvesting and regeneration operations shall be carried out at a time, and in a way, that does not reduce the productive capacity of the site, for example by avoiding damage to soil and retained stands and trees.	YES	<p>NP4406:</p> <p>8.3.3 “Management, harvesting and regeneration operations shall be carried out at a time, and in a way, that does not reduce the productive capacity of the site, for example by avoiding damage to soil and retained stands and trees.”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements that forest operation shall not reduce the productive capacity and shall not damage soil, water and remaining vegetation (8.3.3).</p>
8.3.4 The standard requires that harvesting levels of both wood and non-wood forest products shall not exceed a rate that can be sustained in the long term, and optimum use shall be made of the harvested products.	YES	<p>NP4406:</p> <p>8.3.4 “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.”</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Compliance: Conformity Justification: The standard requires a long-term sustainability of wood and non-wood forest products harvesting (8.3.4).
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	NP4406: 8.3.5 "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." Compliance: Conformity Justification: The standard includes requirements for building forest infrastructure with minimisation of impacts on the environment (8.3.5)
8.4 Criterion 4: Maintenance, conservation and appropriate enhancement of biological diversity in forest ecosystems		
8.4.1 The standard requires that management planning shall aim to maintain, conserve or enhance biodiversity on landscape, ecosystem, species and genetic levels. When the requirement is not achievable within individual, TOF-extensive areas, it can be considered at landscape level or through group certification.	YES	NP4406: C.8.4.1 "Management planning shall aim to maintain, conserve or enhance biodiversity on landscape, ecosystem, species and genetic levels. NOTE: For TOF areas, when it is not possible to fulfil this requirement at the individual level, it can be considered at the landscape or group level". Compliance: Conformity Justification: The Standard includes requirements for conservation, maintenance and enhancement of biodiversity at on landscape, ecosystem, species and genetic levels (C.8.4.1).
8.4.2 The standard requires that inventory, mapping and planning of forest resources shall identify, protect, conserve or set aside ecologically important forest areas. Note: This does not prohibit forest management activities that do not damage the important ecologic values of those biotopes.	YES	NP4406: 3.1.7 "ecologically important forest areas Forest areas: a) containing threatened (3.1.25) (including vulnerable or rare) or representative natural values (species and habitats); or b) containing significant concentrations of endemic species and habitats of threatened species, as defined in Natura 2000 lists and classification; or c) containing in situ endangered or protected genetic resources; or d) contributing to global, regional and national landscapes, with natural abundance and distribution of common species". C.8.4.2 Inventory, mapping and planning of forest resources shall identify, protect, conserve or set aside ecologically important forest areas.

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>NOTE: Only TOF management activities that do not damage the important ecological values of these biotopes are authorized.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard requires to identify and protect ecologically important forest areas (8.4.2). The definition of this term (3.1.7) refers to is compatible with the PEFC Council's definition of the ecologically important forest areas (PEFC ST 1003:2018, 3.5).</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>NP4406:</p> <p>8.4.3 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: This requirement do not prevent trade in species complying with CITES requirements."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard exploitation of threatened and protected species for commercial purposes (8.4.3).</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>NP4406:</p> <p>8.4.4 Successful regeneration shall be ensured through natural regeneration or planting that is adequate to ensure the quantity and quality of the forest resources."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard includes requirements for successful regeneration, being either natural regeneration or planting (8.4.4).</p>
<p>8.4.5 The standard requires that for reforestation and afforestation origins of native species that are well-adapted to site conditions shall be preferred. Only those introduced species, provenances or varieties shall be used whose impacts on the ecosystem and on the genetic integrity of native species and local provenances have been scientifically evaluated, and if negative impacts can be avoided or minimised.</p> <p>Note: CBD (Convention on Biological Diversity) Guiding Principles for the Prevention, Introduction, and Mitigation of Impacts of Alien Species that Threaten Ecosystems, Habitats or Species are recognised as guidance for avoidance of invasive species.</p>	YES	<p>NP4406:</p> <p>8.4.5 "For reforestation and afforestation origins of native species that are well-adapted to site conditions shall be preferred. Other species, provenances or varieties should only be introduced if:</p> <ul style="list-style-type: none"> • the impacts on the ecosystem and on the genetic integrity of native species and local provenances have been scientifically evaluated, and • the negative impacts can be avoided or minimised. <p>NOTE: CBD Guiding Principles are recognised as guidance for avoidance of invasive species."</p> <p>Compliance: Conformity</p> <p>Justification:</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		The standard includes requirements for the usage of native species and restrictions concerning the use of introduced specie, including evaluation of their impacts (8.4.5).
8.4.6 The standard requires that afforestation, reforestation and other tree planting activities that contribute to the improvement and restoration of ecological connectivity shall be promoted.	YES	<p>NP4406:</p> <p>8.4.6 “Afforestation, reforestation and other tree planting activities that contribute to the improvement and restoration of ecological connectivity shall be promoted.”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard requires that planting activities shall contribute to the improvement of ecological connectivity. (8.4.6).</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>NP4406:</p> <p>8.4.7 “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.”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires prohibition of the GMO material in planting (8.4.7).</p>
8.4.8 The standard requires that a diversity of both horizontal and vertical structures and the diversity of species such as mixed stands shall be promoted, where appropriate. The practices shall also aim to maintain or restore landscape diversity.	YES	<p>NP4406:</p> <p>8.4.8 “Diversity of both horizontal and vertical structures and the diversity of species such as mixed stands shall be promoted, where appropriate. The practices shall also aim to maintain or restore landscape diversity.”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements promoting horizontal and vertical diversity of forest stands and maintenance or restoration of landscape diversity (C.8.4.8).</p> <p>Observation</p> <p>The wording “where appropriate” is vague and ambiguous and decreases a level of clarity in the implementation and auditing process.</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>NP4406:</p> <p>8.4.9 “Traditional management practices that create valuable ecosystems on appropriate sites shall be supported, where appropriate.”</p> <p>Compliance: Conformity</p> <p>Justification:</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>The standard requires support to traditional management practices (8.4.9).</p> <p>Observation</p> <p>The wording “where appropriate” is vague and ambiguous and decreases a level of clarity in the implementation and auditing process.</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>NP4406:</p> <p>8.4.10 Managing 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 biodiversity.”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard requires forest management operations that do not cause lasting damages to ecosystems (8.4.10).</p>
8.4.11 The standard requires that infrastructure shall be planned and constructed in a way that minimizes damage to ecosystems, especially to rare, sensitive or representative ecosystems and genetic reserves, and that takes threatened or other key species – in particular their migration patterns – into consideration.	YES	<p>NP4406:</p> <p>8.4.11 “Infrastructure shall be planned and constructed in a way that:</p> <ul style="list-style-type: none"> • minimises damage to ecosystems, especially to rare, sensitive or representative ecosystems and genetic reserves; and • takes threatened or other key species into consideration, in particular their migration patterns (if applicable).” <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard includes requirements building and maintaining forest infrastructure, and minimisation of its negative impacts on biodiversity (8.4.11).</p>
8.4.12 The standard requires that, with due regard to management objectives, measures shall be taken to control the pressure of animal populations on forest regeneration and growth as well as on biodiversity.	YES	<p>NP4406:</p> <p>8.4.12 “With due regard to management objectives, measures shall be taken to control the pressure of animal populations on forest regeneration and growth as well as on biodiversity.”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard includes requirements for control of damages caused by animal population (8.4.12).</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>NP4406:</p> <p>8.4.13 “Standing and fallen dead wood, hollow trees, old groves and rare tree species shall be left in quantities and distribution necessary to safeguard biodiversity, taking into account the potential effect on the health and stability of forests and on surrounding ecosystems. Fire risk and people and property safety shall also be taken into account.”</p> <p>Compliance: Conformity</p> <p>Justification:</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		The standard includes requirements for dead wood and other biodiversity features (8.4.13). The requirement also refers to the risks of wildfires that shall be taken into consideration when implementing the requirement.
8.5 Criterion 5: Maintenance or appropriate enhancement of protective functions in forest management (notably soil and water)		
8.5.1 The standard requires that protective functions of forests for society, such as their potential role in erosion control, flood prevention, water purification, climate regulation, carbon sequestration and other regulating or supporting ecosystem services shall be maintained or enhanced.	YES	<p>NP4406:</p> <p>C.8.5.1 "Trees protective functions in agriculture and landscape shall be maintained or enhanced."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard includes requirements for protection of sites with protective functions for society (C.8.5.1).</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>NP4406:</p> <p>C.8.5.2 "Areas that fulfil specific and recognised protective functions for society shall be mapped. Management plans and operations shall ensure the maintenance or enhancement of these functions."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for identification and mapping of forests with protective functions (C.8.5.2).</p>
8.5.3 The standard requires that special care shall be given to forestry operations on sensitive soils and erosion-prone areas as well as in areas where operations might lead to excessive erosion of soil into watercourses. Techniques applied and the machinery used shall be suitable for such areas. Special measures shall be taken to minimise the pressure of animal populations on these areas.	YES	<p>NP4406:</p> <p>8.5.3 "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."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard includes requirements for protection of soil against erosion on sensitive soils, usage of machinery and control of animal populations (8.5.3).</p>
8.5.4 The standard requires that special care shall be given to forestry operations in forest areas with water protection functions to avoid adverse effects on the quality and quantity of water resources. Inappropriate use of chemicals or other harmful substances or inappropriate silvicultural practices influencing water quality in a harmful way shall be avoided. Downstream water balance and water quality shall not be significantly affected by the operations.	YES	<p>NP4406:</p> <p>8.5.4 "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 silviculture practices influencing water quality in a harmful way shall be avoided. Downstream water balance and water quality shall not be significantly affected by the operations."</p> <p>Compliance: Conformity</p> <p>Justification:</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		The standard includes requirements for protection of quality and quantity of water resources (8.5.4).
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	<p>NP4406:</p> <p>8.5.5 "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."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard includes requirements for forest infrastructure and its impacts on soil and water (8.5.5).</p>
8.6 Criterion 6: Maintenance or appropriate enhancement of socio-economic functions and conditions		
8.6.1 The standard requires that forest management planning shall aim to respect all socio-economic functions of forests.	YES	<p>NP4406:</p> <p>8.6.1 "Forest management planning shall aim to respect all socio-economic functions of forests."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard includes requirements to respect socio-economic functions of forests (8.6.1).</p>
8.6.2 The standard requires that adequate public access to forests for the purpose of recreation shall be provided, taking into account respect for ownership rights, safety and the rights of others, the effects on forest resources and ecosystems, as well as compatibility with other functions of the forest.	YES	<p>NP4406:</p> <p>C.8.6.2 "Adequate public access to TOF areas for the purpose of recreation shall be provided, taking into account respect for ownership rights, safety and the rights of others, the effects on forest resources and ecosystems, as well as compatibility with other functions of the forest."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard ensures public access to ToF and defines cases where the public access can be restricted (C.8.6.2).</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>NP4406:</p> <p>8.6.3 Sites with recognised specific historical, cultural or spiritual significance and areas fundamental to 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 (8.6.3). The requirement does not include reference to indigenous people as those are not present in Portugal.</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,	N/A	<p>NP4406:</p> <p>8.6.4 "Forest management shall promote the long-term health and well-being of communities within or adjacent to</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
where appropriate supported by engagement with local communities and indigenous peoples.		the forest management area, supported by engagement with local communities.” Compliance: Not applicable Justification: The Standard includes requirements supporting local communities (8.6.4) and their engagement. The requirement does not include reference to indigenous people as those are not present in Portugal.
8.6.5 The standard requires that traditional knowledge and recognised best practice for agroforestry & TOF management be utilized. Equitable sharing of the benefits arising from the utilizations of such knowledge, innovations and practices shall be encouraged.	YES	NP4406: C.8.6.5 “Management shall make the best use of traditional knowledge and recognized TOF and agroforestry practices. Equitable sharing of the benefits arising from the utilization of such knowledge shall be encouraged.” Compliance: Conformity Justification: The standard requires the best use shall be made of recognized TOF and agroforestry practices and traditional knowledge.
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	NP4406: 8.6.6 “Forest 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.” Compliance: Conformity Justification: The standard requires to support local economy, training and employment of local people (8.6.6). The requirement does not include reference to indigenous people as those are not present in Portugal.
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	NP4406: 8.6.7 “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.” Compliance: Conformity Justification: The standard includes requirements promoting research activities and data collection (8.6.7). Observation The wording “as appropriate” is vague and ambiguous and decreases a level of clarity in the implementation and auditing process.
9. Performance evaluation		
9.1 Monitoring, measurement, analysis and evaluation		

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
9.1.1 The standard requires that monitoring of forest resources and evaluation of their management, including ecological, social and economic effects, shall be periodically performed, and results fed back into the planning process.	YES	<p>NP4406:</p> <p>9.1.3 “Forest resources monitoring and their management assessment should be done periodically. These results shall be fed back into the planning process, including environmental, social and economic impacts.”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard includes requirement for monitoring of forest resources and review as an integral part of the planning process (9.1.3).</p>
9.1.2 The standard requires that health and vitality of forests shall be periodically monitored, especially key biotic and abiotic factors that potentially affect health and vitality of forest ecosystems, such as pests, diseases, overgrazing and overstocking, fire, and damage caused by climatic factors, air pollutants or by forest management operations.	YES	<p>NP4406:</p> <p>9.1.4 “Health and vitality of forests shall be periodically monitored, especially key biotic and abiotic factors that potentially affect forest ecosystems’ health and vitality, such as pests, diseases, overgrazing and overstocking, fire and damage caused by climatic factors, air pollutants or by forest management operations.”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard includes requirement for monitoring of health and vitality of forest resources (9.1.4).</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>NP4406:</p> <p>9.1.5 “Where it is the responsibility of the forest owner/manager and included in forest management certificate, the economic activities’ regarding non-wood forest products, including hunting and fishing, shall be monitored and controlled.”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard requires monitoring of non-wood forest products (9.1.3).</p>
9.1.4 The standard requires that working conditions shall be regularly monitored and adapted as necessary.	YES	<p>NP4406:</p> <p>9.1.6 “Working conditions shall be regularly monitored and adapted as necessary.”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard requires regular monitoring of the working conditions (9.1.4).</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		
a) conforms to • the organisation’s requirements for its management system;	YES	<p>NP4406:</p> <p>9.2.1 “Objectives</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
• the requirements of the national sustainable forest management standard		<p>The organisation shall perform internal audits at planned intervals to provide information on whether the FMS:</p> <p>a) complies with:</p> <p>i. the organisation's own requirements for its forest management system;</p> <p>ii. this document's requirements;"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard includes requirements for internal audit that are satisfying the PEFC requirements.</p>
b) is effectively implemented and maintained.	YES	<p>NP4406:</p> <p>9.2.1 b) is effectively implemented and maintained."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard includes requirements for internal audit that are satisfying the PEFC requirement.</p>
9.2.2 Organisation The standard requires that the organisation shall:		
a) plan, establish, implement and maintain an audit programme(s) including the frequency, methods, responsibilities, planning requirements and reporting, which shall take into consideration the importance of the processes concerned and the results of previous audits;	YES	<p>NP4406:</p> <p>9.2.2 "The organization shall 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>Compliance: Conformity</p> <p>Justification:</p> <p>The standard includes requirements for internal audit that are satisfying the PEFC requirements.</p>
b) define the audit criteria and scope for each audit;	YES	<p>NP4406:</p> <p>9.2.2 "The organization shall ...b) define the audit criteria and scope for each audit"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard includes requirements for internal audit that are satisfying the PEFC requirements.</p>
c) select the auditors and conduct audits to ensure objectivity and the impartiality of the audit process;	YES	<p>NP4406:</p> <p>9.2.2 "The organization shall ... c) select the auditors and perform audits to ensure objectivity and the impartiality of the audit process. Whoever performs the internal audit shall not evaluate their own work and shall have forestry and standard competences;"</p> <p>Compliance: Conformity</p> <p>Justification:</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		The standard includes requirements for internal audit that are satisfying the PEFC requirements.
d) ensure that the results of the audits are reported to relevant management;	YES	<p>NP4406:</p> <p>9.2.2 “The organization shall ... d) ensure that the audits results are reported to the relevant management responsible according to the functions/units audited and to any other appropriate individuals; and”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard (PCSN I) includes requirements for internal audit that are satisfying the PEFC requirements.</p>
e) retain documented information as evidence of the implementation of the audit programme and the audit results.	YES	<p>NP4406:</p> <p>9.2.2 “The organization shall ... 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 internal audit that are satisfying 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>NP4406:</p> <p>9.3.1 Top management shall carry out an annual review of the organisation's sustainable forest management system, to ensure its continued relevance, adequacy and effectiveness. The top management review should take into account:</p> <p>a) the status of actions from previous management reviews;”...</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard includes requirements for management review that are satisfying the PEFC requirements.</p>
b) changes in external and internal issues that are relevant to the management system;	YES	<p>NP4406:</p> <p>9.3.1 Top management shall carry out an annual review of the organisation's sustainable forest management system, to ensure its continued relevance, adequacy and effectiveness. The top management review should take into account:</p> <p>b) changes in external and internal issues that are relevant to the management system;”</p> <p>Compliance: Conformity</p> <p>Justification:</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		The standard includes requirements for management review that are satisfying the PEFC requirements.
<p>c) information on the organisation's performance, including trends in:</p> <ul style="list-style-type: none"> • nonconformities and corrective actions; • monitoring and measurement results; • audit results; 	YES	<p>NP4406:</p> <p>9.3.1 Top management shall carry out an annual review of the organisation's sustainable forest management system, to ensure its continued relevance, adequacy and effectiveness. The top management review should take into account:"</p> <p>c) information on the organisation's performance, including trends in:</p> <ul style="list-style-type: none"> i. nonconformities and corrective actions; ii. monitoring and measurement results; and iii. audit results;"... <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard includes requirements for management review that are satisfying the PEFC requirements.</p>
d) opportunities for continual improvement	YES	<p>NP4406:</p> <p>9.3.1 Top management shall carry out an annual review of the organisation's sustainable forest management system, to ensure its continued relevance, adequacy and effectiveness. The top management review should take into account:"</p> <p>d) opportunities for continual improvement;"...</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard includes requirements for management review that are satisfying the PEFC requirements.</p>
9.3.2 The standard requires that the outputs of the management review shall include decisions related to continual improvement opportunities and any need for changes to the management system.	YES	<p>NP4406:</p> <p>9.3.2 "Outputs of the management review shall include decisions related to continual improvement opportunities and any changes needed to the forest management system."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard includes requirements for management review that are satisfying the PEFC requirements.</p>
9.3.3 The standard requires that documented information as evidence of the results of management reviews shall be retained.	YES	<p>NP4406:</p> <p>9.3.3 "Documented information shall be retained by the organisation as evidence of the results of management reviews."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard includes requirements for management review that are satisfying the PEFC requirements.</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
10. Improvement		
10.1 Nonconformity and corrective action		
10.1.1 The standard requires that when a nonconformity occurs, the organisation shall:		
a) react to the nonconformity and, as applicable: i. take action to control and correct it; ii. deal with the consequences;	YES	NP4406: 10.1.1 "When a nonconformity occurs, the organisation shall: a) react to the nonconformity and, as applicable: i. take action to control and correct it; ii. deal with the consequences;" Compliance: Conformity Justification: The standard includes requirements for management of non-conformities that are satisfying the PEFC requirements.
b) evaluate the need for action to eliminate the causes of the nonconformity, in order that it does not recur or occur elsewhere, by: i. reviewing the nonconformity; ii. determining the causes of the nonconformity; iii. determining if similar nonconformities exist, or could potentially occur;	YES	NP4406: 10.1.1 "When a nonconformity occurs, the organisation shall: b) evaluate the need for action to eliminate the causes of the nonconformity, in order that it does not recur or occur elsewhere, by: i. reviewing the nonconformity; ii. determining the causes of the nonconformity; iii. determining if similar nonconformities exist, or could potentially occur". Compliance: Conformity Justification: The standard includes requirements for management of non-conformities that are satisfying the PEFC requirements.
c) implement any action needed;	YES	NP4406: 10.1.1 "When a nonconformity occurs, the organisation shall: c) implement any action needed;" Compliance: Conformity Justification: The standard includes requirements for management of non-conformities that are satisfying the PEFC requirements.
d) review the effectiveness of any corrective action taken;	YES	NP4406: 10.1.1 "When a nonconformity occurs, the organisation shall:

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>d) review the effectiveness of any corrective action taken;".</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>
e) make changes to the management system, if necessary.	YES	<p>NP4406:</p> <p>10.1.1 "When a nonconformity occurs, the organisation shall:</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>
10.1.2 The standard requires that corrective actions shall be appropriate to the effects of the nonconformities encountered.	YES	<p>NP4406:</p> <p>10.1.2 "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 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>NP4406:</p> <p>10.1.3 The organisation shall retain documented information as evidence of:</p> <p>a) the nature of the nonconformities and any subsequent actions taken;"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard includes requirements for management of non-conformities that are satisfying the PEFC requirements.</p>
b) the results of any corrective action.	YES	<p>NP4406:</p> <p>10.1.3 The organisation shall retain documented information as evidence of:</p> <p>b) the results of any corrective action."</p> <p>Compliance: Conformity</p> <p>Justification:</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		The standard includes requirements for management of non-conformities that are satisfying the PEFC requirements.
10.2 Continual improvement The standard requires that the suitability, adequacy and effectiveness of the sustainable forest management system and the sustainable management of the forest shall be continuously improved.	YES	NP4406: The organisation shall continually improve the suitability, adequacy and effectiveness of the sustainable forest management system.” Compliance: Conformity Justification: The standard includes requirements for continuous improvement.

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
PEFC ST 1003: Appendix 2/C		
A2/C The standard requires that management of the agricultural components within a TOF system shall follow good agricultural practice.	YES	NP4406: C.4.2.2.2 “In addition to the disposed in Section 4.2.2.2 of this standard, the organisation shall comply with the legislation applicable to the TOF management, agricultural and agroforestry practices.” C.6.3.3 “TOF systems agricultural components management shall regards good agricultural practices and the available guidelines”. Compliance: Conformity Justification: The standard requires to comply with the legislation relating to agriculture and agroforestry practices (C.4.2.2.2) as well with good agriculture practices and available guidelines (C.6.3.3).

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
PEFC ST 1003: Appendix 2/D		
Appendix 2, D Exempted requirements	N/A	Compliance: Not applicable Justification: NP4406 does not provide any exemptions for ToF that are allowed as “potential Exceptions” in PEFC ST 1003:2018, Appendix 2/D. Therefore, all PEFC requirements in PEFC ST 1003:2018 are applicable and have been used in the assessment.

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 	NO	<p>NP 4406:</p> <p>Definitions:</p> <p>3.1.8 "trees outside forests (TOF)</p> <p>Trees in areas not classified as forest (3.1.27) or forest area (3.1.24)</p> <p>a) TOF in urban area</p> <ul style="list-style-type: none"> i) isolated trees or in linear structures (alleys, shelter curtains, riparian galleries, green corridors); or ii) trees in gardens, parks and other green infrastructures. <p>b) TOF in agricultural area</p> <ul style="list-style-type: none"> i) trees in linear structures (alleys, shelter curtains, riparian galleries) < 20m wide and 25m long; or ii) woodlands with less than 0.5ha and tree cover higher than 5% only with tree layer; or iii) woodlands with less than 0.5ha and tree cover higher than 10% with tree and shrub layer; or iv) scatter trees (tree cover less than < 10%)". <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard specifies as a part of the TOF definition, two categories of TOF: (TOF in urban areas and TOF in agriculture areas). The standard does not apply any exemptions for "extensive" categories of ToF.</p> <p>This approach complies with Section E of Appendix 2 (PEFC ST 1003:2018) that refers to the categorization of the ToF (extensive/intensive) for a single purpose, i.e. potential exception of some requirements for "extensive" types of the ToF.</p> <p>This approach is also confirmed by the PEFC Council Board of Directors interpretation on ToF (see chapter 6) that states: "In case the national systems will not define thresholds between extensive and intensive categories, the exceptions provided in Part D cannot be used".</p>

8.9 PEFC Checklist – Complementary Trees outside Forests (PEFC ST 1003:2018, Appendix 2)

8.9.1 1 Scope

Following the PEFC Board decision on 8th March 2023, the National Governing Bodies seeking endorsement through mutual recognition are required to comply with the below system requirements with their Trees outside Forest standards.

8.9.2 2 Checklist

PEFC requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
All national systems shall reach consensus during the standard setting process on the following definitions:		
Forest	YES	<p>NP 4406</p> <p>“3.1.27 forest</p> <p>Land spanning more than 0.5ha, with canopy cover of more than 10% (defined as the ratio between the area of the crowns’ horizontal projection and the total area of the plot), where there is the presence of forest trees that due to its characteristics or management system, it has reached, or will reach, arboreal size (higher than 5 m), regardless of the stage at the time of observation. It includes young natural stands and all plantations established with forestry objectives that have not yet reached a crown density of 10% or a tree height of 5 m. It also includes areas integrated in the forest area that are temporarily deforested as a result of human intervention or natural causes, but for which the reconstitution of forest cover is expected (egg areas recently subjected to final cutting or covered by fire). It also includes clearings and forest infrastructure. Excludes predominantly agricultural land and forest areas with urban land use”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The NP 4406 standard includes the required definition.</p>
Forest plantation	YES	<p>NP 4406</p> <p>“3.1.42 forest plantation</p> <p>Stand of planted trees or resulting from seeding, with the objective of wood or non-wood products, which may include one or more of the following characteristics: reduced number of species, intensive silviculture, regular spacing or even-aged stands”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The NP 4406 standard includes the required definition.</p>
Trees outside Forests	YES	<p>NP 4406</p> <p>“3.1.8 trees outside forests (TOF)</p> <p>Trees in areas not classified as forest (3.1.27) or forest area (3.1.24)</p>

PEFC requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>a) TOF in urban area</p> <p>i) isolated trees or in linear structures (alleys, shelter curtains, riparian galleries, green corridors); or</p> <p>ii) trees in gardens, parks and other green infrastructures.</p> <p>b) TOF in agricultural area</p> <p>i) trees in linear structures (alleys, shelter curtains, riparian galleries) < 20m wide and 25m long; or</p> <p>ii) woodlands with less than 0.5ha and tree cover higher than 5% only with tree layer; or</p> <p>iii) woodlands with less than 0.5ha and tree cover higher than 10% with tree and shrub layer;</p> <p>or</p> <p>iv) scatter trees (tree cover less than < 10%)".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The NP 4406 standard includes the required definition.</p>
Trees outside Forests – Agriculture category (if the scope of the national system is only Trees outside Forests – Settlement category, this is not required)	YES	<p>NP 4406</p> <p>"3.1.8 trees outside forests (TOF)</p> <p>Trees in areas not classified as forest (3.1.27) or forest area (3.1.24) ...</p> <p>b) TOF in agricultural area</p> <p>i) trees in linear structures (alleys, shelter curtains, riparian galleries) < 20m wide and 25m long; or</p> <p>ii) woodlands with less than 0.5ha and tree cover higher than 5% only with tree layer; or</p> <p>iii) woodlands with less than 0.5ha and tree cover higher than 10% with tree and shrub layer;</p> <p>or</p> <p>iv) scatter trees (tree cover less than < 10%)".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The NP 4406 standard includes the required definition.</p>
Trees outside Forests – Settlement category (if the scope of the national system is only Trees outside Forests – Agriculture category, this is not required)	YES	<p>NP 4406</p> <p>"3.1.8 trees outside forests (TOF)</p> <p>Trees in areas not classified as forest (3.1.27) or forest area (3.1.24)</p> <p>a) TOF in urban area</p>

PEFC requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>i) isolated trees or in linear structures (alleys, shelter curtains, riparian galleries, green corridors); or</p> <p>ii) trees in gardens, parks and other green infrastructures...”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The NP 4406 standard includes the required definition.</p>
Ecologically important non-forest areas	NO	<p>The NP 4406 standard does not define the definition of the term “Ecologically important non-forest areas”.</p> <p>See also non-conformity No. 9.</p> <p>Compliance: Minor non-conformity</p> <p>Justification:</p> <p>The NP 4406 standard does not include the required definition of “ecologically important non-forest areas”.</p> <p>It should be noted that the PEFC requirement established by the PEFC Council Board of Directors on 8 March 2023 only came into force after the standard formal approval, after the commencement of the evaluation at the stage of preparing the final draft report. It was neither known to PEFC Portugal at the stage of the standard development nor at the stage of submission of application for the PEFC endorsement. PEFC Portugal also did not have chance to respond to this minor non-conformity.</p> <p>In consideration of this minor non-conformity and PEFC endorsement decision making, the PEFC Council should take into account those facts as well as the retrospective nature of the “new” PEFC requirement.</p>
Defining intensive and extensive categories		
Trees outside Forests – Intensive agriculture category	N/A	<p>Compliance: Not applicable</p> <p>Justification:</p> <p>NP 4406 standard does not make the definition of the “intensive” and “extensive” categories of ToF.</p> <p>However, this PEFC requirement is not applicable as the PEFC Board decision only requires to define those categories where the scheme applies exemptions defined by PEFC ST 1003:2018, Appendix 2/D.</p>
Trees outside Forests – Extensive agriculture category	N/A	<p>Compliance: Not applicable</p> <p>Justification:</p> <p>NP 4406 standard does not make the definition of the “intensive” and “extensive” categories of ToF.</p> <p>However, this PEFC requirement is not applicable as the PEFC Board decision only requires to define those categories where the scheme applies exemptions defined by PEFC ST 1003:2018, Appendix 2/D.</p>

PEFC requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
Trees outside Forests – Intensive settlement category	N/A	<p>Compliance: Not applicable</p> <p>Justification:</p> <p>NP 4406 standard does not make the definition of the “intensive” and “extensive” categories of ToF.</p> <p>However, this PEFC requirement is not applicable as the PEFC Board decision only requires to define those categories where the scheme applies exemptions defined by PEFC ST 1003:2018, Appendix 2/D.</p>
Trees outside Forests – Extensive settlement category	N/A	<p>Compliance: Not applicable</p> <p>Justification:</p> <p>NP 4406 standard does not make the definition of the “intensive” and “extensive” categories of ToF.</p> <p>However, this PEFC requirement is not applicable as the PEFC Board decision only requires to define those categories where the scheme applies exemptions defined by PEFC ST 1003:2018, Appendix 2/D.</p>
Certified area		
<p>National systems shall develop appropriate mechanisms to monitor the ToF areas, where the requirements are implemented. Certified area shall cover the ToF areas with specifications developed according to the ToF categories the system is using for ToF implementation. As a minimum, the definition of the ToF area should relate to the number of hectares covered by the certified area. Certified area information shall be collected for each ToF categories separately.</p> <p>If a certificate includes as part of the certified area ToF and non ToF areas, the ToF and the non ToF areas shall be clearly identified.</p>	NO	<p>The PEFC Council BoD paper on “Assessment and Endorsement of national Trees outside Forests standards” (see chapter 6) requires that the national system shall:</p> <ul style="list-style-type: none"> a) Develop a mechanism to monitor the ToF areas (certified), b) Include certified ToF areas under the term “certified area”, c) Collect the certified area for each ToF categories separately, d) Ensure that ToF and non-ToF areas are clearly identified within certification. <p>NP 4406</p> <p>3.1.6 “certified area</p> <p>Area within the scope of the certificate, belonging to one or more entities, continuously or not, and covered by a sustainable forest management system (3.1.29) certified in accordance with this standard. Includes forest areas (3.1.24) and Trees Outside Forests (3.1.8)”. </p> <p>C7.4.3: “The organisation shall provide to the CB and PEFC updated information on the TOF certified area per year as described in Section 7.4.3 of this standard”.</p> <p>PEFC PT 1002</p> <p>Ch. 5: For SFM the certification document must include at least the following information:</p> <ul style="list-style-type: none"> a) identification of the certification body; b) name and address of the organization and, where applicable, the legal

PEFC requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>locations/entities of the members included in the scope of the certificate;</p> <p>c) type of certificate (individual, group or regional);</p> <p>d) scope of the certification granted, with reference to the applicable standards (NP4406 and PEFC ST 2001, if the entity intends to be a user of the PEFC brands;</p> <p>e) the PEFC logo with the certification body's PEFC trademark license number;</p> <p>f) accreditation mark of the accreditation body (including accreditation number, where applicable);</p> <p>g) the date of attribution of the certification, extension or renewal and the expiry date or expiration date. The effective date of the certification document must not be earlier than the date of the certification decision.</p> <p>h) products covered by the scope of the certificate, according to the PEFC product categories.</p> <p>PEFC PT 1005</p> <p>9.1.1: Application: "The CB shall verify, at this stage, the desired certification scope and the characteristics of the candidate organization which shall have, at least, the following information:...</p> <p>d) the subscriber area covered by forest and/or TOF management system;..."</p> <p>9.4.8: "Additionally, the report shall contain a summary of the certified forest area and the audit results (i.e. a Summary Report) that the forest manager will make publicly available to relevant stakeholders.</p> <p>In certification and recertification is also prepared a summary of the report of stage 2 (i.e., a Summary Report). This summary report is produced by the CB and should contain, at least, information on the certified forest area, identification of the client organization, the scope of the certificate, brief description of the forest management system, namely the elements of public disclosure, summary of findings identified in the audit including the evidence of the public consultation where appropriate. Confidential information must be excluded".</p> <p>Compliance: Minor non-conformity</p> <p>Justification:</p> <p>The Portuguese scheme requires that:</p> <p>a) The certified organisation shall provide the CB and PEFC with updated information on the ToF certified area (NP 4406, C.7.4.3);</p> <p>b) Considers the ToF certified areas as a part of the term "certified area" (NP 4406, 3.1.6),</p> <p>c) Certification process (PEFC PT 1005) distinguishes between forest and ToF management system and requires "ToF" and "forest areas" to be</p>

PEFC requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>submitted as a part of application. The “ToF management system” is also referenced in evaluation and reporting requirements of PEFC PT 1005.</p> <p>However, the minor non-conformity is based on the following arguments:</p> <ul style="list-style-type: none"> a) The Portuguese scheme does not require monitoring and collection on the certified areas of individual categories of ToF (ToF in urban area / ToF in agriculture area); b) It is not evident that the “scope of certification” as described by the certification document is required to reference “ToF certification” (PEFC PT 1002. Ch. 5) . Also the certification report is only required to reference “forest area” (PEFC PT 1005, 9.4.8). <p>It should be noted that the PEFC requirement established by the PEFC Council Board of Directors on 8 March 2023 only came into force after the NP 4406 standard formal approval and after the commencement of the endorsement evaluation, at the stage of preparing the final draft report. It was neither known to PEFC Portugal at the stage of the standard development nor at the stage of submission of application for the PEFC endorsement. PEFC Portugal also did not have chance to respond to this minor non-conformity.</p> <p>When considering this minor non-conformity and making the PEFC endorsement decision making, the PEFC Council should take into account those facts as well as the retrospective nature of the “new” PEFC requirement.</p>

Annex E: Detailed assessment of requirements for forest plantations

The NP4406 standard defines requirements for all types of forests, including forest plantations. For specific requirements, the standard includes Guidelines that define specific guidance for interpretation of the requirement for forest plantations.

The assessment of those Guidelines is made against PEFC ST 1003, Annex 1.

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
PEFC ST 1003: Appendix 1		
<p>The requirements 6.2.2, 8.1.1, 8.2.1, 8.2.2, 8.4.1 and 8.6.1 cannot be applied to individual forest stands and shall be considered on a larger scale (bioregional) within the whole forest management unit where the stands of fast growing trees are complemented by buffer zones and set-aside areas dedicated to environmental, ecological, cultural and social functions.</p> <p>In order to enhance landscape and biodiversity values, and water and soil protection, the size and distribution of the buffer zones and conservation set-aside areas shall be identified at the preparatory stage of the forest plantation establishment, based on social, environmental and ecological assessment, as well as reviewed during the subsequent replanting stages.</p>	YES	<p>NP4406:</p> <p>8.1.1, 8.2.1, 8.2.2, 8.4.1, 8.6.1:</p> <p>“Plantations Guidelines:</p> <p>Where it is not possible to verify this requirement at the individual stand level, it should be considered on a larger scale within the certified area, where stands are complemented with buffer zones and set-aside areas with environmental, ecological, cultural and social functions.</p> <p>With the aim of improving landscape and biodiversity values, water and soil protection, the size and distribution of buffer zones and set-aside areas intended for conservation should be identified at the forest plantation planning stage, based on social, environmental and ecological assessments, as well as reassessed in the (re)afforestation stages.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard provides interpretation that the requirements for forest biodiversity (8.1.1, 8.2.1, 8.2.2, 8.4.1, 8.6.1) shall be considered at the larger scale of certified area, including buffer zones and set-aside areas. The requirements should be applied at the planning stage of the plantations establishment.</p>
<p>8.1.4 The requirement that “forest conversion shall not occur” means that forest plantations 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.</p>	YES	<p>NP 4406</p> <p>8.1.4 “The requirement that “forest conversion shall not occur” means that forest plantations 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”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard requires that forest plantations established by forest conversion after 31 December 2022 shall not be eligible for forest certification.</p>
<p>8.1.5 The requirement for the “reafforestation and afforestation of ecologically important non-forest ecosystems” means that ecologically important non-forest ecosystems reforested or afforested after 31 December 2010 in other than “justified</p>	NO	<p>NP 4406</p> <p>No applicable requirement</p> <p>Compliance: Minor non-conformity</p>

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
circumstances" do not meet the requirement and are not eligible for certification.		<p>Justification:</p> <p>The standard does not have applicable requirement that would state that forest plantations established by conversion of ecologically important forest ecosystems after 31 December 2022 are not eligible for forest certification.</p> <p>The applicant argues that the Plantation Guidelines under 8.1.4 also applies to this case. However, the Guidelines in 8.1.4 explicitly refers to "forest conversion" that this term is clearly defined as conversion from forests to non-forest use or forest plantation. As such the term cannot apply to conversion of non-forest ecosystems to forests (forest plantations).</p>
The requirement laid out in 8.4.2 shall primarily be addressed at the stage of the establishment of forest plantations and those areas shall form part of the buffer zones and set-aside areas that are dedicated to environmental, ecological, cultural and social functions	YES	<p>NP 4406, 8.4.2</p> <p>"Plantations Guidelines:</p> <p>This requirement should be addressed primarily in the implementation phase and be applied in buffer zones and set-aside areas dedicated to environmental, ecological, cultural and social functions".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard provides interpretation that the requirements for ecologically important forest areas biodiversity (8.4.8, 8.4.9, 8.4.13) shall primarily apply to buffer zones and set-aside areas.</p>
The evaluation of the impact of "introduced species, provenances or varieties" shall be understood as having increased importance for forest plantations and shall be an important part of both the planning and management stages of the production cycle.	YES	<p>NP 4406, 8.4.5</p> <p>"Plantations Guidelines:</p> <p>The "introduction of species, provenances or varieties" impact assessment shall be understood as plantations' important additions and shall be an important part of the planning and management phases of the production cycle."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>This PEFC requirement is not included in the PEFC interpretations for forest plantations (PEFC ST 1003, Appendix 2). However, the NP4406 standard does not alter the meaning of the PEFC requirement 8.4.5 but rather stresses and further details importance of impact assessment in introduction of species, provenances and varieties.</p>
The requirements 8.4.8, 8.4.9 and 8.4.13 do not usually apply to forest plantations and shall be understood to be primarily taking place in buffer zones and set-aside areas, which complement forest plantations, and which are dedicated to environmental, ecological, cultural and social functions.	YES	<p>NP 4406</p> <p>8.4.8, 8.4.9, 8.4.13:</p> <p>"Plantations Guidelines:</p> <p>This requirement may not normally be applied to forest plantations but in buffer and set-aside zones that complement forest plantations".</p> <p>Compliance: Conformity</p> <p>Justification:</p>

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		The standard provides interpretation that the requirements for forest biodiversity (8.4.8, 8.4.9, 8.4.13) shall primarily apply to buffer zones and set-aside areas.

Annex F: Detailed assessment of requirements for forest management certification bodies

The assessment is only carried out for certification bodies operating forest management certification. The certification bodies, operating COC certification shall comply with PEFC ST 2003:2020.

No.	PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
Certification Bodies			
1.	Does the scheme documentation require that certification shall be carried out by impartial, independent third parties that cannot be involved in the standard setting process as governing or decision making body, or in the forest management and are independent of the certified entity?	Annex 6, 3.1	YES PEFC PT 1005 "4.2 Impartiality Apply the respective Subsection of ISO/IEC 17021". Compliance: Conformity Justification: The document requires impartial and independent certification body that complies with NP EN ISO/IEC 17021:2013 requirements for impartiality. OR TC 145 clearly states that the NP 4406 standard (SFM) is developed and administered by the NSB (IPQ) in cooperation with SSB (ICNF). This excludes any CB from being the governing or decision-making body of the scheme.
2.	Does the scheme documentation require that certification body for forest management certification shall fulfil requirements defined in ISO 17021?	Annex 6, 3.1	YES PEFC PT 1005 1 "This document provides additional requirements à ISO/IEC 17021 do scheme for certification bodies operating forest management certification against the Portuguese Standard NP4406 "Sustainable Forest Management Systems - Application of the pan-European criteria for sustainable forest management". This document strictly follows the structure of NP EN ISO/IEC 17021. It does not include the text, of NP EN ISO/IEC 17021, and so, should always be used as a complement and with the accessory disposals of the accreditation entities. This document is mandatory for the consistent application of NP EN ISO/IEC 17021 in PEFC forest management systems audits". PEFC PT 1002 "For the certification of the SFM, CBs shall be in compliance with the requirements established by ISO/IEC 17021". Compliance: Conformity Justification: The scheme requires compliance with ISO 17021.
3.	Does the scheme documentation require that certification bodies carrying out forest certification shall have the technical competence in forest management on its economic, social and environmental impacts,	Annex 6, 3.1	YES PEFC PT 1005 7.2.1.4: "The candidates to auditor should possess recognised experience in the forestry sector, at least over a period of three years and relatively recent, in at least one of the following areas: • Systems and Standards of Sustainable Forest Management, in relation to which audits may

No.	PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
	and on the forest certification criteria?		<p>be performed;</p> <ul style="list-style-type: none"> ▪ Technical experience in forest management, ecology, planning and inventory, and management of natural resources and land use management; ▪ Technical aspects of forest operations, whether from the operational point of view or in relation to utilisation and technology and land use management; ▪ Legislation and regulations relevant to forestry activity; ▪ Forest management and TOF areas includes, for example, the management of the agricultural components of the TOF systems, best forestry and agricultural practices, and forestry and arboriculture guidelines and models. <p>Professional experience must at least comply with what is stipulated by IPAC (OGC009) for GFS certification.”.</p> <p>7.2.1.3: “The auditors shall have specific professional training, as extensive as necessary to guarantee capacity and competence in the domains required for the performance and management of the audits. PEFC Portugal shall define in this domain specific training courses to ensure good understanding of the certification criteria in relation to which forest management certification audits are performed.</p> <p>The certification body shall ensure that candidates to auditor demonstrate ability to apply knowledge and skills in the following areas:</p> <ul style="list-style-type: none"> - audit principles, procedures and techniques (see ISO 19011): to enable the auditor to apply those appropriate to different audits and ensure that audits are conducted in a consistent and systematic manner. - organisation situations (ISO 19011), including organizational size, structure, functions and relationships, general business processes and related terminology and cultural and social customs such as knowledge of the client organisation working language: to enable the auditor to comprehend the organisation’s operational context. <p>The training provider entity is responsible for verifying the suitability of the auditors concerning the received training, to ensure that auditors have skills, knowledge and understanding and in the following areas:</p> <p>-General knowledge of the PEFC certification scheme and its principles;</p> <ul style="list-style-type: none"> ▪ Criteria for certification of sustainable forest management: Requirements of the sustainable forest management standard and knowledge of the socio-economics and cultural issues associated with forestry activity; ▪ Legislation, regulations and other relevant requirements – enabling the auditor to operate in the right legal framework and to be aware of the legislative

No.	PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
			<p>requirements applicable to the entity who is the subject of the audit;</p> <ul style="list-style-type: none"> ▪ Principles of forest management based on techniques involving inventories, forest cropping, planning, protection and the management of forest ecosystems – to enable the auditor to examine the forest management system and to decide whether it is being adequately applied; ▪ Natural environmental science, environmental technology and the economic principles applicable to forest management: to give the auditor a grasp of the fundamental relations between human activities and sustainable forest management; ▪ Technical aspects of forestry operations associated with exploitations, technology and derived uses: to allow the auditor to understand the activities of the audited entity and their effects on management itself and on the territory. ▪ Audit principles, procedures and techniques (see ISO 19011): to enable the auditor to apply those appropriate to different audits and to ensure that audits are conducted in a consistent and systematic manner. ▪ Particular features of the client Organisation (see ISO 19011), including organizational size, structure, functions and relationships, general business processes and related terminology and cultural and social customs such as knowledge of the client organisation working language: to enable the auditor to understand the organisation's operational context. ▪ Application of PEFC's trademarks and claims, according to PEFC ST 2001". <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document requires competencies for auditors that is the primary mechanism how to ensure competencies of the whole certification body. In addition, PEFC ST 1005 also includes requirements for education, training, work experience, audit experience and monitoring of auditors.</p>
4.	Does the scheme documentation require that certification bodies shall have a good understanding of the national PEFC system against which they carry out forest management certification?	Annex 6, 3.1	<p>YES</p> <p>PEFC PT 1005</p> <p>7.2.1.3: "The training provider entity is responsible for verifying the suitability of the auditors concerning the received training, to ensure that auditors have skills, knowledge and understanding and in the following areas:</p> <ul style="list-style-type: none"> - General knowledge of the PEFC certification scheme and its principles; <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document requires knowledge of the certification scheme. The good understanding of the whole PEFC</p>

No.	PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
			system is also delivered through the mandatory training organised by the PEFC Portugal.

5.	Does the scheme documentation require that certification bodies have the responsibility to use competent auditors and who have adequate technical know-how on the certification process and issues related to forest management certification?	Annex 6, 3.2	<p>YES</p> <p>PEFC PT 1005</p> <p>7.2.1 "The CB shall have a documented process to ensure auditors have personal attributes, knowledge and skills in accordance with requirements ISO 19011".</p> <p>7.2.1.3 "The certification body shall ensure that candidates to auditor demonstrate ability to apply knowledge and skills in the following areas:</p> <ul style="list-style-type: none"> ▪ audit principles, procedures and techniques (see ISO 19011): to enable the auditor to apply those appropriate to different audits and ensure that audits are conducted in a consistent and systematic manner. ▪ organisation situations (ISO 19011), including organizational size, structure, functions and relationships, general business processes and related terminology and cultural and social customs such as knowledge of the client organisation working language: to enable the auditor to comprehend the organisation's operational context". <p>7.2.1.4 "The candidates to auditor should possess recognised experience in the forestry sector, at least over a period of three years and relatively recent, in at least one of the following areas:</p> <ul style="list-style-type: none"> ▪ Systems and Standards of Sustainable Forest Management, in relation to which audits may be performed; ▪ Technical experience in forest management, ecology, planning and inventory, and management of natural resources and land use management; ▪ Technical aspects of forest operations, whether from the operational point of view or in relation to utilisation and technology and land use management; ▪ Legislation and regulations relevant to forestry activity; ▪ Forest management and TOF areas includes, for example, the management of the agricultural components of the TOF systems, best forestry and agricultural practices, and forestry and arboriculture guidelines and models. <p>Professional experience must at least comply with what is stipulated by IPAC (OGC009) for GFS certification".</p> <p>Additional or overlapping requirements for auditors are also included in PEFC PT 1003.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PEFC Pt 1005 and PEFC Pt 1003 include comprehensive and detailed requirements for auditors, including education, training, work experience, audit experience, areas of competencies and monitoring of auditors performance.</p> <p>Observation:</p> <p>The requirements for auditors are described in two documents, PEFC PT 1005 and PEFC PT 1003. Some of the requirements are overlapping and described in both documents and could create unnecessary confusion in application of the documents.</p>
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No.	PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
			PEFC PT 1005 makes an explicit reference to compliance with PEFC PT 1003. This ensures that both documents shall be used and complied with.
6.	Does the scheme documentation require that the auditors must fulfil the general criteria of ISO 19011 for Quality Management Systems auditors or for Environmental Management Systems auditors?	Annex 6, 3.2	<p>YES</p> <p>PEFC PT 1005</p> <p>7.2.1 " The CB shall have a documented process to ensure auditors have personal attributes, knowledge and skills in accordance with requirements ISO 19011".</p> <p>7.2.1.3 "The certification body shall ensure that candidates to auditor demonstrate ability to apply knowledge and skills in the following areas:</p> <ul style="list-style-type: none"> ▪ audit principles, procedures and techniques (see ISO 19011): to enable the auditor to apply those appropriate to different audits and ensure that audits are conducted in a consistent and systematic manner. ▪ organisation situations (ISO 19011), including organizational size, structure, functions and relationships, general business processes and related terminology and cultural and social customs such as knowledge of the client organisation working language: to enable the auditor to comprehend the organisation's operational context". <p>7.2.1 "The CB shall have a documented process to ensure auditors have personal attributes, knowledge and skills in accordance with requirements ISO 19011".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PEFC PT 1003 and PEFC PT 1005 requires auditors knowledge relating to ISO 19011.</p>
7.	Does the scheme documentation include additional qualification requirements for auditors carrying out forest management audits? [*1]	Annex 6, 3.2	<p>YES</p> <p>See PEFC requirement 5.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PEFC PT 1005 includes comprehensive and detailed requirements for auditors, including education, training, work experience, audit experience, areas of competencies and monitoring of auditors performance.</p>
Certification procedures			
8.	Does the scheme documentation require that certification bodies shall have established internal procedures for forest management certification?	Annex 6, 4	<p>YES</p> <p>ISO 17021-1: "10.1 The certification body shall establish, document, implement and maintain a management system that is capable of supporting and demonstrating the consistent achievement of the requirements of this International Standard."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The compliance is delivered through ISO/IEC 17021-1 that requires the certification body to establish management system, including documentation.</p>

No.	PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
9.	Does the scheme documentation require that applied certification procedures for forest management certification shall fulfil or be compatible with the requirements defined in ISO 17021?	Annex 6, 4	YES PEFC PT 1005 and PEFC PT 1002 require compliance with ISO 17021. See also PEFC requirement 2. Compliance: Conformity Justification: The document requires compliance with ISO 17021.
10.	Does the scheme documentation require that applied auditing procedures shall fulfil or be compatible with the requirements of ISO 19011?	Annex 6, 4	YES PEFC PT 1005 7.2.1.3 "The certification body shall ensure that candidates to auditor demonstrate ability to apply knowledge and skills in the following areas: ▪ audit principles, procedures and techniques (see ISO 19011): to enable the auditor to apply those appropriate to different audits and ensure that audits are conducted in a consistent and systematic manner. ▪ organisation situations (ISO 19011), including organizational size, structure, functions and relationships, general business processes and related terminology and cultural and social customs such as knowledge of the client organisation working language: to enable the auditor to comprehend the organisation's operational context". Compliance: Conformity Justification: The document requires auditors compliance with ISO 19011. In addition, the latest edition of ISO 17021-1 (2015) already incorporated auditing procedures of ISO 19011 edition to which Annex 6 of the PEFC Technical Document refers.
11.	Does the scheme documentation require that certification body shall inform the relevant PEFC National Governing Body about all issued forest management certificates and changes concerning the validity and scope of these certificates?	Annex 6, 4	NO PEFC PT 1002 5: "CFFP/PEFC Portugal accepts applications of CB's that fulfil the accreditation requirements described in the present document for SFM or CoC certification. The CB applying to PEFC Notification shall: ▪ Addressed to CFFP/PEFC Portugal the written application (PEFC notification application template) for acquire PEFC notification and follow the administrative conditions which deal with communication of the CB with the CFFP/PEFC Portugal, transfer of information and updates, financial conditions (payment of the notification taxes), ▪ Provide to CFFP/PEFC Portugal punctually with information regarding the concession or modification of all certificates granted in Portugal, in accordance with the provisions laid down in the corresponding procedures. The data to be provide shall be communicate to CFFP/PEFC Portugal annually, or whenever requested to do...". Compliance: Minor non-conformity Justification: PEFC PT 1002 requires that the certification body shall agree to follow administrative conditions specified by

No.	PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
			<p>the PEFC notification and provide PEFC Portugal with data relating to issued certificates.</p> <p>However, PEFC Portugal has not presented the “administrative conditions” referenced in PEFC PT 1002, ch.5 and has not provided evidence that all issued certificates and changes to their scope and validity is communicated to PEFC Portugal.</p> <p>PEFC Portugal provided as a response to a draft interim report a Notification Contract with the certification bodies. However, the submitted contract is only applicable to chain of custody certification based on PEFC ST 2002 and does not apply to forest management certification.</p>
12.	Does the scheme documentation require that certification body shall carry out controls of PEFC logo usage if the certified entity is a PEFC logo user?	Annex 6, 4	<p>YES</p> <p>PEFC PT 1002</p> <p>4 “CB shall verify the use of the PEFC trademarks issued by the certified entity, if is a PEFC trademark user in accordance with PEFC ST 2001. CBs must also evaluate PEFC claims issued by the certified entity, in accordance with the PEFC ST 2002 standard within the scope of the CoC certification or, in accordance with the NP4406 standard within the scope of the SFM certification.”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PEFC PT 1002 requires that the certification body shall also evaluate the client’s usage of the PEFC Logo.</p>
13.	Does a maximum period for surveillance audits defined by the scheme documentation not exceed more than one year?	Annex 6, 4	<p>YES</p> <p>PEFC PT 1005</p> <p>9.6.2 “The CB has to undertake annual evaluations of the certified forest management system. The date of the first surveillance audit following initial certification shall not be more than 12 months from the last day of the stage 2 audit”.</p> <p>“In each annual surveillance audits the CB shall inform the CFFP/PEFC Portugal by sending the audit conclusions and the PEFC SFM registration form dully updated, signed and dated by the client organization”.</p> <p>ISO 17021-1: “9.1.2.2 The audit programme shall include a two-stage initial audit, surveillance audits in the first and second years, and a recertification audit in the third year prior to expiration of certification”.</p> <p>ISO 17021-1: “9.1.2.3 Surveillance audits shall be conducted at least once a calendar year. The date of the first surveillance audit following initial certification shall not be more than 12 months from the certification date”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PEFC PT 1005 specifies annual surveillance audits. In addition, the compliance is also delivered through the mandatory reference to ISO 17021.</p>
14.	Does a maximum period for re-assessment audit not	Annex 6, 4	<p>YES</p> <p>PEFC PT 1005</p>

No.	PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
	exceed five years for forest management certifications?		<p>9.6.3 "Apply the respective Subsection of ISO/IEC 17021".</p> <p>ISO 17021-1: "9.1.2.2 The audit programme shall include a two-stage initial audit, surveillance audits in the first and second years, and a recertification audit in the third year prior to expiration of certification".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The compliance is delivered through the mandatory reference to ISO 17021.</p>
15.	Does the scheme documentation include requirements for public availability of certification report summaries?	Annex 6, 4	<p>NO</p> <p>PEFC PT 1005</p> <p>9.4.8 "Additionally, the report shall contain a summary of the certified forest area and the audit results (i.e. a Summary Report) that the forest manager will make publicly available to relevant stakeholders.</p> <p>In certification and recertification is also prepared a summary of the report of stage 2 (i.e., a Summary Report). This summary report is produced by the CB and should contain, at least, information on the certified forest area, identification of the client organization, the scope of the certificate, brief description of the forest management system, namely the elements of public disclosure, summary of findings identified in the audit including the evidence of the public consultation where appropriate. Confidential information must be excluded.</p> <p>This Summary Report is a document of public access on the process of certification of sustainable forest management and should be available on the Website of the client organization and CFFP.)".</p> <p>Compliance: Minor non-conformity</p> <p>Justification:</p> <p>PEFC PT 1005 requires public availability of certification report summary. However, the document does not specify the timescale and as such does not satisfy the PEFC Council interpretation¹⁷ of this requirement published on Podio.</p> <p>PEFC Portugal provided a response to this non-conformity^[54] arguing that it has no access to the interpretation published by the PEFC Council at the Podio. It should be noted that the assessor has no access to communication between the PEFC Council and its members and their access to information published at the Podio. The assessor has neither responsibility to ensure proper communication between the PEFC Council and its members.</p>
16.	Does the scheme documentation include requirements for usage of	Annex 6, 4	<p>YES</p> <p>PEFC PT 1005</p>

¹⁷ The "applicable requirements defined by a certification scheme" shall cover, amongst others, "that the summary shall be made available to any interested party on request within a defined timescale".
[/https://podio.com/pefc-international/pefc-standards-interpretations-and-clarifications/apps/standards-interpretations-and-clarification/items/2\)](https://podio.com/pefc-international/pefc-standards-interpretations-and-clarifications/apps/standards-interpretations-and-clarification/items/2)

No.	PEFC benchmark requirement		YES / NO	Reference to system documentation (including quotation of relevant text)
	information from external parties as the audit evidence?			<p>9.1.3 "CBs should shall established documented procedures for:...</p> <p>- organization and structuring of public consultation processes to the SFM system taking into account that these should be previously planned and prepared, ensuring that relevant information's about the opinions of the interested parts are included as audit evidence whenever appropriate".</p> <p>9.3.1 "As supplemental, the following certification criteria shall be checked:</p> <p>(3) Conduct the public consultation of the forest management system and collect opinions of the interested parties, as audit evidences, whenever appropriated;"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document requires to use information from external parties and also requires stakeholders consultation.</p> <p>The PEFC Council's interpretation of the requirement clarifies that the " <i>audit must, amongst other relevant information, include sufficient consultation with external stakeholders to ensure that all relevant issues are identified relating to compliance with the requirements of the standard</i>"¹⁸.</p> <p>Observation</p> <p>PEFC PT 1005, 9.1.3 includes wording "CB shall should" that is probably a result of translation error. However, this wording is bias and could lead to confusion and incorrect interpretation of the requirement.</p>
17.	Does the scheme documentation include additional requirements for certification procedures? [¹]	Annex 6, 4	YES	<p>Compliance: Conformity</p> <p>Justification:</p> <p>PEFC PT 1005 includes additional requirements for planning and conducting audits, etc.</p> <p>It also makes a mandatory reference to OGC009 (Guide for implementation of ISO/IEC 17021-1) issued by IPAC, the Portuguese national accreditation body.</p>
Accreditation procedures				

¹⁸ <https://podio.com/pefc-international/pefc-standards-interpretations-and-clarifications/apps/standards-interpretations-and-clarification/items/1>

No.	PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
18.	Does the scheme documentation require that certification bodies carrying out forest management certification shall be accredited by a national accreditation body?	Annex 6, 5	YES PEFC PT 1002 3 "The certification of SFM shall be carried out by CB's accredited by an accreditation body that are signatories of the Multilateral Recognition Arrangements (MLA) for product certification of IAF or IAF's Regional Accreditation Groups such as European co-operation for Accreditation (EA), and having in place proceedings according to the ISO /IEC 17011 and other documents, recognized by these entities. In Portugal, the accreditation body with the described specifications is, today, IPAC." Compliance: Conformity Justification: The document refers to an accreditation body that is a member of IAF or EA and makes reference to the Portuguese national accreditation body, IPAC. Both IAF and EA represent national accreditation bodies.
19.	Does the scheme documentation require that an accredited certificate shall bear an accreditation symbol of the relevant accreditation body?	Annex 6, 5	YES PEFC PT 1002 3 "The certification of SFM shall be carried out by CB's accredited by an accreditation body that are signatories of the Multilateral Recognition Arrangements (MLA) for product certification of IAF or IAF's Regional Accreditation Groups such as European co-operation for Accreditation (EA), and having in place proceedings according to the ISO /IEC 17011 and other documents, recognized by these entities. In Portugal, the accreditation body with the described specifications is, today, IPAC." 4 "The scope of the accreditation of the SFM shall explicitly cover the Portuguese Standard for the sustainable forest management NP4406 Sustainable Forest Management Systems - Application of the pan-European criteria for sustainable forest management) in its valid version and/or with reference to any future changes and amendments adopted by CFFP/PEFC Portugal and presented at the official website www.pefc.pt ". 5 "(2.) For GFS the certification document must include at least the following information: ... f) accreditation mark of the accreditation body (including accreditation number, where applicable); ...". Compliance: Conformity Justification: PEFC PT 1002 requires a scheme specific accreditation that results in accredited certification and accreditation mark/symbol being placed on the certificate.
20.	Does the scheme documentation require that the accreditation shall be issued by an accreditation body which is a part of the International Accreditation	Annex 6, 5	YES PEFC PT 1002 3 "The certification of SFM shall be carried out by CB's accredited by an accreditation body that are signatories of the Multilateral Recognition Arrangements (MLA) for product certification of IAF or IAF's Regional

No.	PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
	Forum (IAF) umbrella or a member of IAF's special recognition regional groups and which implement procedures described in ISO 17011 and other documents recognised by the above mentioned organisations?		<p>Accreditation Groups such as European co-operation for Accreditation (EA), and having in place proceedings according to the ISO /IEC 17011 and other documents, recognized by these entities. In Portugal, the accreditation body with the described specifications is, today, IPAC.”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PEFC PT 1002 The document refers to an accreditation body that is a member of IAF and complies with ISO 17011.</p>
21.	Does the scheme documentation require that certification body undertake forest management certification as “accredited certification” based on ISO 17021 and the relevant forest management standard(s) shall be covered by the accreditation scope?	Annex 6, 5	<p>PEFC PT 1002</p> <p>3 “The certification of SFM shall be carried out by CB’s accredited by an accreditation body that are signatories of the Multilateral Recognition Arrangements (MLA) for product certification of IAF or IAF’s Regional Accreditation Groups such as European co-operation for Accreditation (EA), and having in place proceedings according to the ISO /IEC 17011 and other documents, recognized by these entities. In Portugal, the accreditation body with the described specifications is, today, IPAC.”</p> <p>4 “The scope of the accreditation of the SFM shall explicitly cover the Portuguese Standard for the sustainable forest management NP4406 Sustainable Forest Management Systems - Application of the pan-European criteria for sustainable forest management) in its valid version and/or with reference to any future changes and amendments adopted by CFFP/PEFC Portugal and presented at the official website www.pefc.pt”.</p> <p>5 “(2.) For GFS the certification document must include at least the following information:...</p> <p>f) accreditation mark of the accreditation body (including accreditation number, where applicable);...”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PEFC PT 1002 requires a scheme specific accreditation that results in accredited certification and accreditation mark/symbol being placed on the certificate.</p>
22.	Does the scheme documentation include a mechanism for PEFC notification of certification bodies?	Annex 6, 6	<p>PEFC PT 1002</p> <p>5 “CFFP/PEFC Portugal accepts applications of CB’s that fulfil the accreditation requirements described in the present document for SFM or CoC certification. The CB applying to PEFC Notification shall:...”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The scheme documentation requires PEFC notification of certification bodies.</p>

No.	PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
23.	Are the procedures for PEFC notification of certification bodies non-discriminatory?	Annex 6, 6	<p>YES</p> <p>PEFC PT 1002</p> <p>5 "The evaluation result will allow a decision non-discriminatory about the admission to the CB Notification. In case of the evaluation result is positive, the mechanism of the CB Notification will be instructed by firming a contract covering a specific notification scope (CoC or SFM) for PEFC Notification and the fulfilment of any accessories obligations related with the specific accreditation requirements described in this document."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PEFC PT 1002 includes a statement that the evaluation result will allow a non-discriminatory decision.</p> <p>PEFC PT 1002 has been found as not including any requirements or procedures that could be found discriminatory.</p>

Annex G: Stakeholder's representation in TC 145

Stakeholder category	Name	Organisation
A – Industry and Trade (incl. Forest owners)	Inês Costa Luz – TC 145 President	SONAE ARAUCO Portugal
	Miguel Rocha	ABASTENA - Sociedade Abastecedora de Madeiras,Lda.
	Isabel Pais Queiroz e Melo	ACHAR- Associação de Agricultores de Charneca
	Paulo Jorge Monteiro Santos Poço	ACRIGUARDA
	Susana Candeias Mestre	AFLOBEI - Associação de Produtores Florestais da Beira Interior
	Filipa Azinheira	AFLOSOR - Associação dos Produtores Agro-florestais da Região de Ponte de Sor
	Altina Ribeiro	AIMMP- Associação das Indústrias de Madeira e Mobiliário de Portugal
	Pedro Miguel Serafim	ALTRI Florestal SA
	Pedro Serra Ramos	alsa agente
	Pedro Pacheco Marques	ANSUB - Associação de Produtores Florestais do Vale do Sado
	Rute Almeida Fernandes dos Santos	APAS Floresta - Associação de Produtores Florestais
	Tiago Emanuel de Oliveira Mucha	APFC – Associação dos Produtores Florestais do Concelho de Coruche e limítrofes
	Marco Mendes	APFCAN- Associação Produtores Florestais dos Concelhos Alcobaça e Nazaré
	Susana Carneiro	Associação para a Valorização da Floresta de Pinho - Centro PINUS
	Sara Pereira	CELPA - Associação da Indústria Papeleira
	Rita Paiva	CNA - Confederação Nacional de Agricultura
	António Cláudio Heitor	CONFAGRI - Confederação Nacional das Cooperativas Agrícolas e do Crédito Agrícola de Portugal, CCRL
	José Ângelo Costa Pinto	Cooperativa Agrícola de Penela da Beira
	Manuel Joaquim Miranda Fernandes Gonçalves	FNAP – Federação Nacional dos Apicultores de Portugal
	Luís Miguel Antunes Damas	FNAPF – Federação Nacional das Associações de Proprietários Florestais
	Rosário Alves	Forestis - Associação Florestal de Portugal
	Maria João Rodrigues	LIPTOFLO, SA
	Ricardo Manuel Pereira	SOPROFE- Sociedade Produção Florestal Lda.
	Ana Catarina Gregório Manta	The Navigator Company
	Conceição Santos Silva	UNAC - União da Floresta Mediterrânica
	Cristina Paço	Unimadeiras – Produção, Comércio e Exploração Florestal, S.A.
A1 - SME	Susana Brígido	2B Forest
	Miguel Serrão	Bosque do Conhecimento
	Luis Roxo Almeida	CERNA (Attrativa Cascade Unipessoal Lda.)
	Rita Oom	Individual
	Filipa Gouveia	KS.Solutions, Lda
	Cláudia Viliotis	METACORTEX
	Samuel Frazão	Versátil Vantagem Lda
B – Government and administration	Mafalda Maria da Cunha Alves	Câmara Municipal de Amarante
	Ana David Palmar	Câmara Municipal de Benavente
	Helena Capelo	Câmara Municipal de Lisboa
	Sofia Gaspar Mendonça	Comunidade Intermunicipal do Oeste
	Filipa Bragança	DGPC - Direção-Geral do Património Cultural
	Samuel Melro	Direção Regional da Cultura do Alentejo
	Belém Campos Paiva	Direção Regional da Cultura do Norte
	Frederico José Tátá dos Anjos Regala	Direção Regional de Cultura do Algarve
	Carlos Manuel dos Santos Banha	Direção Regional de Cultura do Centro
	Vasco António Martins de Medeiros	Direção Regional dos Recursos Florestais - Região Autónoma dos Açores
	Dina Anastácio	ICNF IP-Instituto de Conservação da Natureza e das Florestas

	Luísa Guerra	ICNF IP-Instituto de Conservação da Natureza e das Florestas
	Ferdinando Abreu	Instituto das Florestas e Conservação da Natureza, IP-RAM
	Emanuel do Carmo Delgado Carapinha	SEPNA - Serviço de Protecção da Natureza e Ambiente da GNR
C - Consumers	Joana Mendes Godinho	Individual
E – Universities and technological centres	Sónia Figo	CBE - Centro de Biomassa para a Energia
	Pedro César Ochôa de Carvalho	CEF - Instituto Superior de Agronomia/ Centro de Estudos Florestais
	José Paulo Cortez	CIMO - Instituto Politécnico de Bragança -Mountain Research CenterEnvironment and Natural Resources Dept
	Luís António da Cruz Tarelho	Departamento de Ambiente e Ordenamento, Universidade de Aveiro
	Natércia Maria Ferreira dos Santos	Instituto Politécnico de Tomar
	Ana Paula Ramos	Laboratório de Patologia Vegetal Veríssimo de AlmeidaInstituto Superior de Agronomia
	César Garcia	Museu Nacional de História Natural e da Ciência, Universidade de Lisboa
	Luís Filipe Antunes da Silva	Ordem dos Engenheiros Técnicos
	Daniela Ferreira	RAIZ - Instituto de investigação da Floresta e Papel
F – Application of the standard	Filipe Melo	AFLOESTE - Associação Interprofissional da Floresta do Oeste
	Joana dos Guimarães Sá	APCER – Associação Portuguesa de Certificação
	Maria Margarida Fernandes Pinto Barbosa	Associação de Produtores Florestais do Vale do Minho
	Catarina Aguiar	Associação para a Certificação Florestal do Baixo Vouga
	Elisabete Abreu	Associação para a Certificação Florestal do Minho-Lima
	Firmino Miguel Antão Serra	Certiflorbeira - Associação para a Certificação Florestal da Beira Baixa
	Luis Vaz Freire	CERTIS - Controlo e Certificação, Lda
	Raquel Martinho	CFFP/ PEFC Portugal
	Sofia Ferreira	FSC Portugal/ AGFR - Associação para uma Gestão Florestal Responsável
	Isabel Ramos	KIWA Sativa - Unipessoal, Lda.
G – Non-governmental organisations	Carlos Alberto Costa Pereira Simões Ferreira	ANBP - Associação Nacional dos Bombeiros Profissionais
	Leónia Nunes	SPCF - Sociedade Portuguesa de Ciências Florestais
	Rui Valentim Marques de Lemos Cordeiro	Vertigem - Associação Promoção do Património
G1 – Environmental NGOs	Marcial Felgueiras	A Rocha - Associação Cristã de Estudo e Defesa do Ambiente
	Susana Maria Pinto de Noronha	ASE- Amigos da Serra da Estrela
	Filipa de Jesus Gouveia	LPN – Liga para a Protecção da Natureza
	Rui Alexandre Moura Sequeira Dias	PALOMBAR - Associação de Conservação da Natureza e do Património Rural
	Maria Amélia Martins-Loução	SPECO- Sociedade Portuguesa de Ecologia

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

Part I: General Information

Stakeholder name:

Main Contact: First Name Last Name

E-mail: ex: myname@example.com

Stakeholder group:

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

Part II: Announcement of the NP 4406 development process

Have you noticed announcement of start of the revision of the NP 4406 standard (2015)?

- ☐ YES
- ☐ NO
- ☐ NOT SURE

Where did you notice the announcement?

- ☐ Direct mailing (e-mail)
- ☐ At the IPQ, ICNF or PEFC Portugal website
- ☐ IPQ, ICNF or PEFC Portugal Press Release
- ☐ IPQ, ICNF or PEFC Portugal social media (facebook, twitter...)
- ☐ Other

Did you have access to the standard setting procedures (ON TC 145)?

- ☐ YES
- ☐ NO
- ☐ NOT SURE

Additional notes:

Type here...

Part III: Technical Committee 145

The ICNF multi-stakeholder body that was responsible for development of the NP 4406 standard

Have you been invited to nominate your representative to TC 145 for the revision of the NP 4406 standard?

- ☐ YES
- ☐ NO
- ☐ NOT SURE

What was the form of the invitation?

- ☐ General invitation by IPQ, ICNF or PEFC Portugal website, press release, etc.
- ☐ Direct invitation by e-mail
- ☐ Other

Have you made a nomination to TC 145?

- ☐ YES
- ☐ NO

Has your nomination been accepted/rejected?

- ☐ YES
- ☐ NO
- ☐ NOT SURE

Have you received justification of rejection of your nomination?

- ☐ YES
- ☐ NO
- ☐ NOT SURE

Additional notes:

Type here...

Part IV: Public consultation

Have you noticed public consultation(s) on a draft NP 4406 Standard?

- ☐ YES
- ☐ NO
- ☐ NOT SURE

Where have you noticed invitation to public consultation?

- ☐ Direct mailing (E-mail)
- ☐ IPQ, ICNF or PEFC Portugal's press release
- ☐ Journals / magazines
- ☐ IPQ, ICNF or PEFC Portugal'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...

Part V: Complaints

Have you submitted to the ICNF or IPQ any complaint relating to the revision process?

- ☐ YES
- ☐ NO
- ☐ NOT SURE

Has the complaint been considered and resolved by the ICNF or IPQ?

- ☐ YES
- ☐ NO
- ☐ NOT SURE

Additional notes:

Type here...

Part VI: Participation in TC 145

This section only applies to those stakeholders who participated in TC 145

Was the work of the TC 145 organized in transparent way?

- ☐ YES
- ☐ NO
- ☐ NOT SURE

Has TC 145 reached consensus on the NP 4406 standard?

- ☐ YES
- ☐ NO
- ☐ NOT SURE

Additional notes:

Type here...

Protection of personal data

Here at TJCConsulting we take your privacy seriously, and will only use your personal information to conduct the objective and transparent assessment of the PEFC Portugal forest certification scheme. 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 processing your details to the PEFC Council?

- ☐ YES
- ☐ NO

Annex J: Report from in-country visit

As a part of the assessment, the assessor conducted during 14-17 November 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;
- Evaluation of the pilot testing of the ToF with a specific focus on applicability of the ToF requirements;
- Clarification of issues and non-conformities identified in the draft interim report.

Program and timetable of the online interview

Date	14 Nov 2022	15 Nov 2022	16 Nov 2022	17 Nov 2022
Day	Monday	Tuesday	Wednesday	Thursday
Itinerary	Opening meeting	Stakeholders interview	Field trip ToF	Stakeholders interview
	Stakeholders interview	Stakeholders' interview		Closing meeting

Stakeholders interviewed

Mr. Tymrak interviewed a number of stakeholders relevant to the development of the NP 4406 standard and the PEFC Portugal scheme:

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.

The following organizations have been met and interviewed:

PEFC Portugal	Raquel Martinho
	Paula Salazar
	Paula Guimares (PEFC PT Board)
	Joana Mendez Godinho (PEFC PT consultant)
	Luis Sarabando

Stakeholders		
Industries and Trade (A), including forest owners	Altri	Pedro Serafim
	SONAE	Ines Costa Luz
	CELPA	Sara Pereira
	Centro PINUS	Pedro Teixeira
	ACFML	Margarida Barbosa
	ACFML	Elisabete Abreu
	AFLOBEI	Susana Mestre
	ACFPIN	Firmino Serra
	The Navigator Company	Ana Catarina Manta
	ANEFA	Pedro Serra Ramos
	AFBV	Luis Sarabando
	AFBV	Catarina Aguidar
Public administration (B)	DRRF Azores	Vasco Medeiros
	ICNF	Jose Manuel Rodriques
	IP-RAM, Instituto das Florestas e Conservacao da Natureza	Roberto Abreu
	CIM Oeste	Sofia Mendonca
	ACT	Carlos Montemor
Consumers (C)	DECO	Elsa Agante
Research centres and higher education institutions (E)	ISA	Ana Paula Ramos
	UA	Luiz Tarelho
	IPB	Paulo Cortez
	Raiz	
Managing and Implementation of the standards (F)	Unimadeiras	
	Municipio da Lousada	
	APCER (certification body)	Joana dos Guimaraes Sa
	ToF expert	Filipa Gouveia
	Kiva Sativa (certification body)	Afonso Pires
	Certis (certification body)	Luis Vaz Freire
	IPAC (accreditation body)	Alberto Mosqueira
Non-governmental Organisations (G)	IPQ	Gisela Niz
	Federacao Portuguesa de Orientacao	Luis Quinta-Nova
	Palombar	Ruis Dias
Non-governmental Environmental Protection Organisations (G1)	Sociedade Portuguesa de Ecologia	Maria Amelia Loucao

Stakeholders' feedback:**Standard setting:**

- a) The invitation to the Forum was done on personal basis by a direct contact;
- b) TC 145 representation was balanced and included all relevant stakeholders; strong representation of the forestry sector with some new representatives of the environment protection interest,
- c) TC 145 members and work were supported by PEFC Portugal, provided with excellent information and coordination service;
- d) The process included sufficient discussion and good / professional atmosphere at all levels, TS 145 sub-committees and working groups;
- e) Work was mainly focused on development of indicators that are measurable,
- f) Consensus was reached, issues were resolved by discussion and voting was thus unanimous,
- g) Time for the process was sufficient;
- h) The standard was tested for the ToF implementation of the standard;
- i) Development of the standard under the Portuguese official standardisation provides additional robustness, credibility and acceptance of the standard;
- j) The process was influenced by COVID. However, online approach for meetings provided higher level of participation;
- k) Advantage of one group developing both, the PEFC and FSC standards,
- l) IPQ conducts an annual check of the ICNF (NSB),
- m) IPQ rules require 5 year review and revision of NP standards,
- n) No complaints submitted to PEFC Portugal, ICNF nor to IPQ.

Critical issues within the revision:

- a) Structure, using the IS High Level Standard (HLS),
- b) Native species,
- c) Working conditions, Safety of forest work
- d) Importance of timber harvesting, especially in private forests, motivating private forest owners to actively manage forests,
- e) Water and soil protection function of forests,
- f) Recreational role of forests,
- g) Rural fires,
- h) Use of chemicals for conservation purposes – invasive species,
- i) Reference to national legislation,
- j) ToF
- k) Importance of group / regional certification for small forest owners,
- l) Level of bureaucracy in implementation and auditing of the standard,

Feedback on ToF:

- a) There are different types of ToF, the NP4406 standard is mainly focused on ToF for nature protection purposes;
- b) It is expected that the certification of ToF will have a form of adding ToF to the scope of existing certification and adding new areas (properties) to the group certification;
- c) The NP 4406 standard clearly distinguishes between the forest and ToF as two exclusive land categories;
- d) The ToF recognises contribution of individual trees to biodiversity within agriculture and urban environment;
- e) ToF can significantly increase visibility of the PEFC scheme, its public awareness and recognition;
- f) Municipalities are starting to make inventory of trees within their urban area, followed by evaluation of their environmental and biodiversity values, PEFC certification can be used as a tool to deliver those values,
- g) Management of ToFs can attract public subsidies (mainly municipalities) as well as private investments within carbon projects.

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

Chapter (Report) / PEFC requirement	PEFC Council comment	Assessor's response
NC No. ; p 27, 30,	This process related NC could be addressed by an action plan development, which should be developed as a corrective action to address this issue for the next revision.	<p>The report results in identification of non-conformities and recommendations relating to the scheme endorsement. For non-conformities relating to the standard setting process, the recommendation does not require to correct the non-conformity as it would require to repeat the revision process.</p> <p>Amendment to the report: The recommendation chapter will indicate that PEFC Portugal should acknowledge the non-conformity and implement appropriate actions during the next revision.</p>
Observation – review date, p. 33	In our view, this is a non-conformity. Please revisit the assessment decision.	<p>The classification of the issue as “observation” was made based on assumption that this is an editorial issue. Although the term “NGB revision by date: 2027-05-10” is considered as “unclear and ambiguous”, the intention to revise the standard by certain date is understandable, especially referring to a date five years after formal approval. The improper wording “by” and “revision” disadvantages PEFC Portugal as the interpretation of those terms would make the period in between the formal approval of the standard and review or revision shorter than required by the PEFC Council.</p> <p>Amendment to the report: The report will be amended and the issue will be reported as minor non-conformity.</p>
Stakeholders interviews, p. 38	This statement is contradicting the findings of the standard setting process. We didn't see questions for this aspect of the process, suggest to delete this.	<p>The whole chapter refers to the feedback given by stakeholders during the face-to-face interviews or telephone conferences and does not need to fully correspond with the findings or conclusions of the assessment. During the stakeholders interview conducted as a part of the in-country visit, all stakeholders were asked whether or not they see the composition of TC 145 as balanced and including all relevant stakeholders. The interviewed stakeholders responded “Yes” and although it can be subjective, this was a view of interviewed stakeholders. This view was taken in the consideration but is only one of sources of information used to make assessment conclusions.</p> <p>Amendment to the report: I will amend the chapter to make clear that it summarises prevailing views of interviewed stakeholders.</p>

NC 6, p. 46	I agree, but it's very likely a translation issue. "Agents" are not used anywhere else (except for biological agents) in the document, but operators are mentioned in NP 4406 4.2.5.3	The NC has not been assigned because of the word "agent" but because of the wording the management system shall be suitable for". This is also described in the justification for the non-conformity. This is not a translation issue as PEFC Portugal would respond to this NC by providing "correct" translation.
NC 8, p 49	You're right. It would be better that this is further defined. However, the affected stakeholders (8.1.5. b) are part of the process, thus the small proportion should have its context based on these consultative records. No non-conformity was raised for the same text in the UA SFM standard. Please revisit the assessment decision.	The issue was re-classified as an observation. The fact that non-forest areas or larger extent are likely to be outside the forest management certification and the requirement wouldn't apply to them anyway.
Checklist, ST 1002, 4.3.3 (p 129)	It is required that the standard defines, which SFM requirements are to be fulfilled at group level. The B 4.3.1.3 suggest that every group can have different interpretation. If it would be the case, that it's stated that all participants should fulfil each requirement, it would be a conformity. Please revisit the assessment decision.	The requirements for the group certification in an Annex B of the Standard. An interpretation is given for each requirement of the core part and clearly indicates whether the requirement shall be met by the group organisation or the requirements the requirement of the core part shall be applied without any modification (e.g. "Apply Subsection 6.2.1 of this standard"). Therefore, the standard makes clear which requirements shall be met at the group level and which shall be applied as described in the core part. Chapter 4.3.1.3 then indicates that as a part of the definition of the scope of the management system, it shall be defined which requirements can be applied at the group level. Following the structure of the standard, the definition of the scope and boundaries of the management system is a responsibility of the "group organisation" ("B.4.3.1 Based on the definitions in Section 3, the group organisation should consider for its system' scope:..."). Amendment to the report: Justification has been amended
Checklist, ST 1002 9.3.1.3, p 1.48	Does this mean that if a group participant is an organization covering 100 members, all the 100 members will be subject of the internal audit, if the organization will be become the subject	The standard allows participation of "sub-groups". Those formally constituted groups are considered as a single participant within the sampling methodology. An important pre-condition for this arrangement is that groups shall be formally constituted and shall include "management delegation". This means that the group and

	of internal audit of the group?	<p>represented area has a common forest management, similar to a scenario of a single forest owner.</p> <p>Following the requirements of the standard, this sub-group would be considered as a single participant. Where the group (participant) is selected for an internal audit, the forest area represented by the group would be audited in the same / similar way as if the area would belong to a single forest owner.</p> <p>Amendment to the report: Justification has been amended</p>
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