



Assessment of the Ukraine Forest Certification Scheme against the requirements of the PEFC Council

Final report, 9 April 2021



Woodmotion

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Abbreviations

CoC	Chain of Custody
EA	European Co-operation for Accreditation
FMP	Forest management plan
FMU	Forest management level
FSC	Forest Stewardship Council
IAF	International Accreditation Forum
ISO	International Standardisation Organisation
NVFCs	National Voluntary Forest Certification Scheme, also Association “National Voluntary Forest Certification Scheme”
PEFC	Programme for the Endorsement of Forest Certification
SFM	Sustainable forest management
WG	Working Group

1 Background

The Association National Voluntary Forest Certification System (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 NVFCS scheme against the PEFC Council's requirements, TJConsulting **recommends to the Board of Directors:**

- a) **to note a single minor non-conformity (1)** with the PEFC Council's requirements relating to the standard-process¹;
- b) **to recommend the scheme** for PEFC endorsement for a temporary period of 18 months. Within the 18 months period, the assessor will carry out the in-country visit and based on its results, the PEFC endorsement will be suspended, terminated or confirmed as full regular endorsement.
- c) **to acknowledge** the applicant's "Action plan to prevent the risk of illegal wood and corruption in forest sector of Ukraine" (see Annex I, chapter 5.7, 8.7) and consider its successful implementation as the PEFC endorsement condition. The scheduled in-country visit of the assessor shall evaluate and report on the implementation of the Action Plan.

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

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 of the applicant (NVFCS) is primarily governed by UA SFM ST 01 (Standard Setting Procedures). Dispute settlement for the standard setting and also for other activities of the applicant is governed by UA SFM ST 04 (Dispute settlement procedures).

The scheme's standard setting procedures are logically structured and are mainly based on PEFC ST 1001:2017. They provide procedural basis for multi-stakeholder, open, transparent and consensus driven process. The procedures **comply with** PEFC ST 1001:2017.

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 activities carried out during the period between Autumn 2019 (process preparation) and June 2020 (publication of the forest management standard).

The standard setting process was led by a 12 members Working Group with representation of key stakeholder groups, including forest owners/managers, forest industry, academic and scientific community, E-NGO, labour representatives and others. The members of the WG had significant forestry and environmental based knowledge and practical experience and were well respected personalities within the Ukraine forestry, environmental, and scientific community. The WG had an appropriate gender balance.

Following the internal discussions within the WG, two public consultations and three pilot tests, the WG reached consensus by unanimous voting. The standard was then formally approved by the General Assembly of the applicant and published at its website.

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

(1) Announcement of the process' start – invitation of stakeholders to comment on the process (6.3.1e)

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

5.3 Group forest management certification

The scheme allows group certification as a certification model that is suitable to the small forest owners in Ukraine but it is also expected that it will be used for state forest enterprises. The requirements for group certification are defined in UA SFM ST 03 (*Group Forest Management. Requirements*).

The document defines a specific sampling methodology for internal auditing programme that is based on evaluation of risk for individual participants in the group.

The scheme documentation for the group certification **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 UA SFM ST 02 and in UA SFM TD 09 (concerning pesticides use).

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

The general management system requirements are largely identical with PEFC ST 1003:2018.

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. For each of the criterion the first level requirements are largely identical with the requirements of PEFC ST 1003:2018. The second level of requirements provides detailed performance-based and measurable indicators or means of verification.

UA SFM ST 02 and UA SFM TD 09 **comply** with the requirements of PEFC ST 1003:2018.

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

5.5 Chain of custody requirements

The applicant has formally adopted the PEFC international standard for chain of custody (PEFC ST 2002:2020) directly by approving the standard as a part of the scheme and indirectly through mandatory references in the notification procedures (UA SFM ST 06), and as such **complies** with the PEFC requirements.

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

5.6 Requirements for chain of custody certification bodies

The applicant has formally adopted the PEFC International requirements for chain of custody certification bodies (PEFC ST 2003:2020) as a part of the scheme and as such **complies** with the PEFC requirements.

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

5.7 Requirements for forest management certification bodies

The requirements for certification bodies for forest management certification are described in UA SFM ST 05 (*Requirements for certification bodies operating against the forest management standard*). The document follows structure of ISO 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 IAF member and to conduct the forest management certification as accredited certification.

The scheme's requirements for certification bodies, their accreditation and notification **comply** with Annex 6 of the PEFC Technical Document.

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

5.8 Evaluation of the impact of the Earthsight report of illegal logging and corruption in Ukraine

In 2018, the Earthsight, a UK based non-profit organisation, published a report "Complicit Corruption"² with numerous allegations relating to illegal logging and corruption in forestry sector and timber trade in Ukraine. The report connects the illegal and corrupted practices in Ukraine to organisations responsible for forest management, state forest administration, custom administration, timber traders and finally to large international buyers and manufacturers of timber located within the EU. The report also analysis the role of FSC (the Forest Stewardship Council) and the certification scheme's capability to detect and prevent the alleged illegal activities.

Regardless of the validity or justifications of allegations made in the Earthsight report, the scheme should be able to respond to the mentioned allegations. The scheme should have ability to detect the described types of illegal activities either directly in the certification activities or respond to reported illegal activities through accreditation process and/or complaints management at all levels.

Taking into account the specific situation in Ukraine as well as seriousness and consequences of such accusations, the scheme should adopt specific measures, even when going over and above the PEFC International benchmark requirements, that would mitigate the risk of such activities taking place on PEFC certified forest area. Those measures should be addressed in both, the development of the scheme's documentation, rules and guidance but also in implementation of the scheme, including awareness, promotional and training activities.

Following the draft interim report and discussion with the scheme's representatives, the NVFCS decided to develop and adopt an "Action plan to prevent the risk of illegal wood and corruption in forest sector of Ukraine" (see Annex I).

² COMPLICIT IN CORRUPTION, How billion-dollar firms and EU governments are failing Ukraine's forests, 2018, www.earthsight.org.uk

The Action Plan that has been formally approved by the NVFCS and published at the NVFCS website^[29] includes specific measures that cover the following areas:

Area	Implemented	Planned to be implemented
Engagement with state administration in combatting illegal logging and corruption and developing forest strategy;	●	●
Checklist for auditors with the list of pre-dominant illegal activities	● ³	
Training for all stakeholders		●
Strengthening stakeholders' consultation and use of external sources of information as a part of the audit	● ⁴	
Amended programme for training of auditors and their attestation		●
Amendment to the complaints' procedures with special reference to illegal activities and corruption	● ⁵	●
Cooperation with E-NGO "Deep Green of Ukraine"		●

Assessor's conclusion

The corruption issue and illegal logging is a complex issue and no single tool such as forest certification will be able to resolve it fully and completely. It is assumed that only cumulative effort of both governmental as well non-governmental organisations, producers as well as buyers of forest-based material will be able to initiate necessary changes in the forestry sector and in the society.

The proposed Action Plan has potential to mitigate the risk that the activities associated with illegal logging and corruption are prevented on certified forest land and/or detected by certification audits.

The assessor recommends to the PEFC Council Board of Directors to acknowledge the Action Plan and to request the Assessor to evaluate progress on its implementation as a part of the in-country visit that is scheduled for no later than 18 months from the scheme's endorsement.

³ UA SFM ST 05, 7.10d and Appendix 4

⁴ UA SFM ST 05, 9.2.2.1, 7.10d

⁵ UA SFM ST 04, 5.5

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

Tender dossier Call for proposals for the assessment of the Ukraine 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 7 September 2020 and additional information provided by the applicant during the assessment process.

During the assessment process, the applicant responded to identified minor non-conformities by revising its documentation and submitted new editions of existing and one new document. The latest documentation that has been used as basis to this evaluation is presented in the following table.

Submitted scheme documentation

Guidance (GD)	
UA SFM GD 01:2020 (2E)	Inventory Conduct Procedure for National Voluntary Forest Certification System (2nd Edition, 1.3.2021)
UA SFM GD 02:2020 (2E)	Stakeholder Engagement of National Voluntary Forest Certification System (2nd Edition, 1.3.2021)
Standards (ST)	
UA SFM ST 01:2020 (2E)	Procedure for Development, Approval, Revision of the Forest Management Standard (2nd Edition, 1.3.2021)
UA SFM ST 02:2020 (2E)	Sustainable Forest Management. General Provisions (2nd Edition, 1.3.2021)
UA SFM ST 03:2020 (2E)	Group Forest Management. Requirements (2nd Edition, 1.3.2021)
UA SFM ST 04:2020 (2E)	Procedure for Managing Complaints and Appeals (2nd Edition, 1.3.2021)
UA SFM ST 05:2020 (2E)	Requirements for Certification Bodies operating Certification against the Forest Management Standard (2nd Edition, 1.3.2021)
UA SFM ST 06:2020 (2E)	Procedure for Notification of Certification Bodies in National Voluntary Forest Certification System (2nd Edition, 1.3.2021)
UA SFM ST 07:2020 (2E)	Procedure for Attestation of the Auditors (2nd Edition, 1.3.2021)
PEFC ST 2001:2020	PEFC Trademarks Rules. Requirements
PEFC ST 2002:2020	Chain of Custody of Forest and Tree Based Products - Requirements
PEFC ST 2003:2020	Requirements for Certification Bodies operating Certification against the PEFC International Chain of Custody Standard
Technical Documentation (TD)	
UA SFM TD 01:2020 (2E)	Regulations for National Voluntary Forest Certification System (2nd Edition, 1.3.2021)
UA SFM TD 02:2020 (2E)	Regulations for the Temporary Working Group on the Development and Implementation of National Voluntary Forest Certification System (2nd Edition, 1.3.2021)
UA SFM TD 03:2020 (2E)	Regulations for the Working Group on the Development of Forest Management Standard (2nd Edition, 1.3.2021)
UA SFM TD 04:2020 (2E)	Regulations for the Center of Preparation and Attestation of Experts-Auditors (2nd Edition, 1.3.2021)

UA SFM TD 05:2020 (2E)	Regulations for Complain and Appeal Committee (2nd Edition, 1.3.2021)
UA SFM TD 06:2020 (2E)	List of Stakeholders (2nd Edition, 1.3.2021)
UA SFM TD 07:2020 (2E)	Regulatory and Procedural Base of National Voluntary Forest Certification System (2nd Edition, 1.3.2021)
UA SFM TD 08	Issuance of PEFC Logo usage licences
UA SFM TD 09:2021	List of WHO Class 1A and 1B pesticides, which are allowed for using in forest management of Ukraine in exceptional cases

Other supporting scheme documentation:

Development report, including primary records of the standard setting as appendices

Appendix 1	Statutes of the Association
Appendix 2	Letter from Agency of Forest Resources of Ukraine to PEFC International
Appendix 3	Certificate of membership in the PEFC Council
Appendix 4	Proposal for Forest Management Standard Development
Appendix 5	Minutes WG 15.1.2020
Appendix 6	Minutes WG 30.1.2020
Appendix 7	Minutes WG 20.2.2020
Appendix 8	Synopsis of comments and proposals
Appendix 9	Minutes WG 28.3.2020
Appendix 10	Synopsis of comments and proposals (2)
Appendix 11-1	Report field testing (SGS)
Appendix 11-2	Report field testing
Appendix 12	Minutes WG 9-12.6.2020
Appendix 13	Minutes – the Association Council

PEFC Checklists 30/06/2020

Records on the standard setting process referenced in the assessment

(The references to the following records and evidences are made throughout the report)

- [1] Individual comments received during the first round of public consultation
- [2] Individual comments received during the second round of consultation
- [3] E-mail approval of the final version of the Forest Management Standard by the Working Group
- [4] [NVFCS website: Public announcement of the start of the standard setting process \(15.12.2019\)](#)
- [5] [Website of the “Society of Foresters of Ukraine”: Public announcement of the start of the PEFC standard setting process \(18.12.2019\)](#)
- [6] Invitation e-mails to the Working Group meetings (print screens of the e-mail communication with the Working Group members.
- [7] Youtube channel of PEFC Ukraine with recordings of the Working Group meetings ([National voluntary forest certification system - YouTube](#))
- [8] PEFC Ukraine Facebook: [\(1\) Національна Система Лісової Добровільної Сертифікації | Facebook](#)
- [9] E-mail correspondence of the Working Group members recommending the final draft standard for formal approval (17-18/06/2020)
- [10] [The PEFC Ukraine's website: Announcement of the public consultation \(24/02/2020\)](#)
- [11] Announcement of the public consultation at the PEFC Ukraine's Facebook (21/02/2020, 24/02/2020) ([\(1\) Національна Система Лісової Добровільної Сертифікації | Facebook](#))
- [12] Announcement at the public Facebook group: Forest Lovers of Ukraine (24 February 2020): [ЛІСОЛЮБИ УКРАЇНИ \(facebook.com\)](#)
- [13] E-mail correspondence to stakeholders announcing public consultation (24/01/2020)
- [14] [Announcement of the end of the public consultation at the PEFC Ukraine website \(4/5/2020\)](#)
- [15] [Summary report of the public consultation published at the PEFC Ukraine website \(4/5/2020\):](#)
- [16] [The PEFC Ukraine's website: Announcement of the second public consultation \(5/5/2020\)](#)
- [17] [Announcement of the second public consultation at the PEFC Ukraine's Facebook \(5/5/2020\)](#)
- [18] E-mail correspondence to stakeholders announcing the second public consultation (5/5/2020)
- [19] [Announcement of the end of the public consultation at the PEFC Ukraine website \(16/6/2020\)](#)
- [20] [Summary report of the public consultation published at the PEFC Ukraine website \(16/6/2020\)](#)
- [21] [Announcement of the pilot testing at the PEFC Ukraine website \(8/5/2020\)](#)
- [22] [Announcement of the result of pilot testing at the PEFC Ukraine website \(16/6/2020\)](#)
- [23] [Publication of the scheme documentation at the PEFC Ukraine website](#)
- [24] [Announcement of the formal approval of the forest management standard at the PEFC Ukraine website \(26/6/2020\)](#)
- [25] [Announcement of the publication of the Development Report on the Forest Management Standard at the PEFC Ukraine website \(1/7/2020\)](#)

- [26] A screenshot of e-mail distribution of the announcement of the start of the standard setting process and invitation to stakeholders
- [27] [Public announcement at the NVFCS website: reminder of the public consultation on the SFM standard and the standard setting process \(24/3/2020\)](#)
- [28] Screenshots of e-mail communication with stakeholders that submitted comments to the public consultation (the first as well as the second round)
- [29] [Action plan to stop illegal wood and corruption, published at NVFCS website](#)
- [30] [Framework Convention on the Protection and Sustainable Development of the Carpathians](#) (Convention ratified by law N 1672-IV (1672-15), Article 4/1,2)
- [31] ТЕОРЕТИЧНІ ТА ТЕХНОЛОГІЧНІ ОСНОВИ ВІДТВОРЕННЯ ЛІСІВ НА ЗАСАДАХ ЕКОЛОГІЧНО ОРІЄНТОВАНОГО ЛІСІВНИЦТВА, Mayrer, B. M., chapter 1.2 (available at: https://wood.openforest.org.ua/wp-content/uploads/2020/02/nti_2.pdf)
- [32] [Стале ведення лісового господарства](#), page 6-7
- [33] [Особливості природного відновлення сосняків Східного Полісся \(на прикладі ДП "Свеське ЛГ"\) / В. М. Маурер, Д. С. Донік //](#)
- [34] [State of the Europe's Forests, 2020](#), Forest Europe

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 7 September 2020 and the TJConsulting's tender proposal of 20 November 2020.

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 7 September 2020 and the tender proposal of 20 November 2020.

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	4 Jan 2021
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	4 Jan 2021 – 1 Feb 2021
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	1 Feb 2021 – 1 March 2021
Stakeholders online interview	The consultant conducted an online interview of the applicant's staff / key persons/stakeholders	A report on the on-line interview	3 – 19 Feb 2021
Stage 2 assessment	Stage 2 covered consideration of the applicant's responses as well as	Final draft report	1 – 15 March 2021

Stage	Description	Output	Time / Period
	comments received from the PEFC international public consultation		
Stakeholders consultation	TJConsulting analysed stakeholders' comments resulting from direct invitation of Ukrainian stakeholders	Final draft report	18 Jan – 5 Mar 2021
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	15 - 25 March 2020 weeks(expected)
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)	9 April 2020

7.3 Classification of non-conformities

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

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

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

8 Assessment

8.1 General analysis of the structure of the scheme

The scheme documentation

The scheme documentation is structured into three (3) categories: Guidance (GD), Standards (ST) and Technical Documentation (TD). In addition, NVFCS also adopted as a part of the scheme three (3) PEFC Council International Standards (PEFC ST 2001:2020, PEFC ST 2002:2020 and PEFC ST 2003:2020).

Guidance (GD)

UA SFM GD 01	Inventory Conduct Procedure for National Voluntary Forest Certification System
UA SFM GD 02	Stakeholder Engagement of National Voluntary Forest Certification System

Standards (ST)

UA SFM ST 01	Procedure for Development, Approval, Revision of the Forest Management Standard
UA SFM ST 02	Sustainable Forest Management. General Provisions
UA SFM ST 03	Group Forest Management. Requirements
UA SFM ST 04	Procedure for Managing Complaints and Appeals
UA SFM ST 05	Requirements for Certification Bodies operating Certification against the Forest Management Standard
UA SFM ST 06	Procedure for Notification of Certification Bodies in National Voluntary Forest Certification System
UA SFM ST 07	Procedure for Attestation of the Auditors
PEFC ST 2001:2020	PEFC Trademarks Rules. Requirements
PEFC ST 2002:2020	Chain of custody of forest and tree based products -Requirements
PEFC ST 2003:2020	Requirements for Certification Bodies operating Certification against the PEFC International Chain of Custody Standard

Technical Documentation (TD)

UA SFM TD 01	Regulations for National Voluntary Forest Certification System
UA SFM TD 02	Regulations for the Temporary Working Group on the Development and Implementation of National Voluntary Forest Certification System
UA SFM TD 03	Regulations for the Working Group on the Development of Forest Management Standard
UA SFM TD 04	Regulations for the Center of Preparation and Attestation of Experts-Auditors
UA SFM TD 05	Regulations for Complain and Appeal Committee
UA SFM TD 06	List of Stakeholders
UA SFM TD 07	Regulatory and Procedural Base of National Voluntary Forest Certification System.
UA SFM TD 08	Issuance of PEFC Logo usage licences
UA SFM TD 09	List of WHO Class 1A and 1B pesticides, which are allowed for using in forest management of Ukraine in exceptional cases

The scope of individual documents is logically defined to cover individual processes and functions of the scheme and to avoid unnecessary duplication of requirements/procedures. Each of the following processes are covered by a separate and distinct documentation.

UA SFM TD 01 defines overall structure, processes and organisational arrangement of the scheme.

UA SFM TD 07 lists all the scheme's documents, including their date of approval, date of expiry, published editions of documents, and their short summary. It provides useful overview of all scheme documentation and its revision in time.

Process	GD	ST	TD
Standard setting	UA SFM GD 02	UA SFM ST 01	UA SFM TD 02 UA SFM TD 03 UA SFM TD 06
Forest management		UA SFM ST 02	UA SFM TD 09
Group forest certification		UA SFM ST 03	
Chain of custody		PEFC ST 2002	
PEFC Trademark usage		PEFC ST 2001	
Certification and accreditation		UA SFM ST 05 UA SFM ST 07 PEFC ST 2003	UA SFM TD 04
Issuance of the PEFC Logo licenses			UA SFM TD 08
Notification of certification bodies		UA SFM ST 06	
Dispute resolution		UA SFM ST 04	UA SFM TD 05
Other scheme administration function	UA SFM GD 01		UA SFM TD 01 UA SFM TD 07

Observation

It is not absolutely clear based on what criteria are individual documents developed as GD, ST or TD, especially those that apply to the scheme administration. For example, UA SFM TD 08 for issuance of PEFC licenses is developed as TD document while UA SFM ST 06 for notification of certification bodies is developed as ST document.

However, this comment has no impact on applicability of the documents themselves.

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.

NVFCS	<p>The Standard setting body/the scheme owner</p> <ul style="list-style-type: none"> - Develops and manages the scheme; - Notifies (formally recognises) the certification bodies; - Issues the PEFC Logo licenses in Ukraine. <p>For the purposes of the development of the forest management standard and other part of the scheme documentation, NVFCS forms Working Groups and a Complaints and Appeals Committee.</p>
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 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>NVFCS requires the accreditation body to be a member of the IAF.</p>
Forest owner / management company / group of forest owners	<p>Forest 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 standard setting procedures

The standard setting and revision process governed by the NVFCS is primarily regulated by UA SFM ST 01 (Standard Setting Procedures). Additional more detailed provisions are defined in UA SFM GD 02 for engagement of stakeholders; UA SFM TD 03 for the work of the Working Group (for the SFM standard development) and UA SFM TD 02 for the work of the Working Group for scheme implementation.

Dispute settlement for the standard setting and also for other activities of NVFCS is defined in UA SFM ST 04 and work of the “Complaint and appeal committee” in UA SFM TD 05.

UA SFM ST 01 identifies NVFCS as the standardisation body with the Working Group as the body with balanced representation of stakeholders that is responsible for building consensus.

A. Procedures for the standard setting process

The standard setting procedures document (UA SFM ST 01) is logically structured and follows the process approach defined in PEFC ST 1001:2017. It largely uses its structure and sometimes also wording. UA SFM ST 01 includes procedural requirements for:

- Identification of stakeholders, including key and disadvantaged stakeholders, their constraints and means of resolving them;
- Announcement of the standard setting in media as well as by direct communication with stakeholders, providing information about the planned process and inviting stakeholders to submit their nominations to the Working Group;
- Establishment of the WG;
- Development of the standard by the WG;
- Two months public consultation announced in media as well as by direct communication to stakeholders, consideration of their comments and making summary of the comments and their consideration publicly available;
- Second, one-month public consultation for new standards;
- Pilot testing;
- Decision making of the WG and building consensus;
- Formal approval of the standard by the General Meeting of NVFCS and its publication;
- Maintenance of the standard, including its review and revision.

In addition, additional more detailed provisions are defined in UA SFM GD 02 for engagement of stakeholders; UA SFM TD 03 for the work of the Working Group (for the SFM standard development)

Working Group for the development of the standard

UA SFM ST 01 and UA SFM TD 03 requires that the WG is established by the Head of the NVFCS based on nominations of stakeholders and requires balance of stakeholders within six predefined stakeholder groups:

Group 1: Forest management bodies,

- Group 2: Business and industry,
- Group 3: Non-governmental organizations,
- Group 4: Scientific and technological community,
- Group 5: Workers and trade unions,
- Group 6: Women and children.

UA SFM ST 01/UA SFM TD 03 do not define any specific thresholds for decision making of the Working Group when a formal voting is used. Instead, they refer to the general definition of consensus applied by ISO Guide 59 and PEFC ST 1001:2017 and voting mechanism is primarily used to identify any opposition within the Working Group. Several actions are defined to resolve any sustained opposition to the standard.

Dispute settlement procedures

UA SFM ST 01 includes general provisions for dealing with the complaints relating to the standard setting activities that are identical with PEFC ST 1001:2017. Two specific documents, UA SFM ST 04 and UA SFM TD 05 include detailed requirements for resolution of complaints and appeals and work of the “Complaints and Appeal Committee”.

Review and revision of the standards

UA SFM ST 01 includes an identical approach towards the review and revision of the forest management standard. It requires a periodic, maximum five years, review of the forest management standard that includes a gap analysis as well as stakeholders consultation.

Following the review, UA SFM ST 01 defines three types of revisions, periodic revision, editorial revision and time-critical revision.

B. Results of the assessment of the standard setting procedures

UA SFM ST 01 and supporting documentation relevant to the standard-setting **comply** with the PEFC requirements.

8.2.2 Assessment of the standard setting process

Scope of the assessment

The scope of this assessment is focused on the standard setting activities carried out during the period between December 2019 and June 2020 (publication of the forest management standard).

Following PEFC ST 1001:2017, the assessment is only focused on the development of the forest management standard (UA SFM ST 02). Development of other documentation and standards of the Ukraine scheme is outside the scope of this assessment.

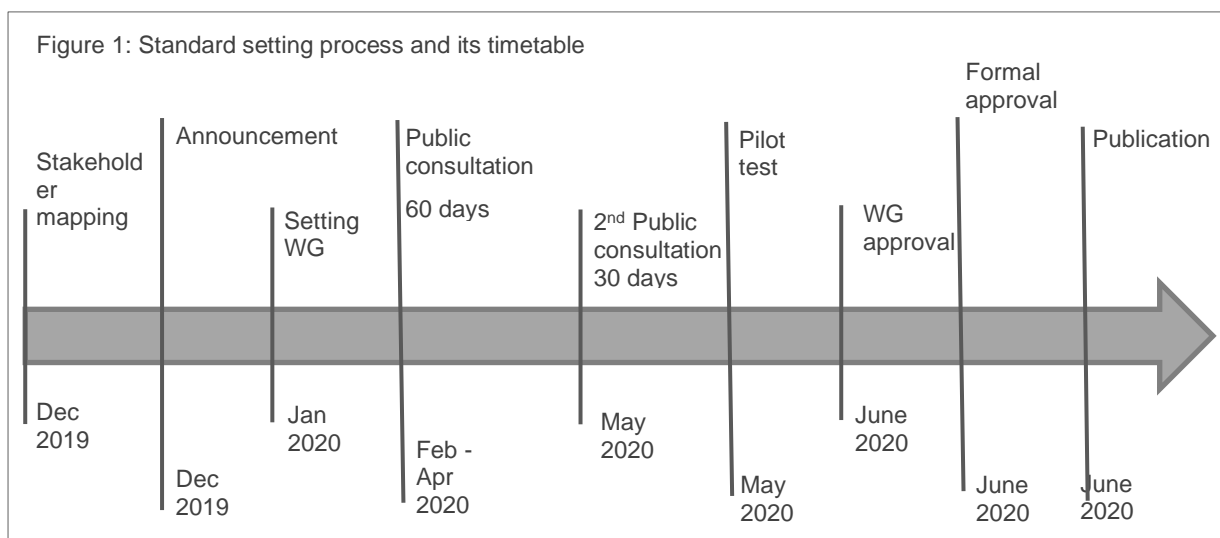
Standard setting process

The standard setting process formally started by development of a Project proposal and stakeholders mapping exercise that was carried out by NVFCS in December 2019.

This step was followed by the formal announcement of the process start that was presented at the PEFC Ukraine website on 15 December 2019.

The process was completed by the formal approval of the forest management standard (UA SFM ST 01 on 24 June 2020 and publication its publication at the NVFCS website.

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



Stakeholders mapping

NVFCS identified 91 stakeholders that were classified within 6 stakeholder groups. The output of the stakeholder mapping was then approved as the scheme document UA SFM TD 06.

NVFCS carried out an assessment of the level of interaction (importance and relevancy of the stakeholders) for all six stakeholder groups and based on that assessment decided that all the stakeholders (stakeholder groups) are considered as key stakeholders. For all the stakeholder groups (6), the NVFCS documentation also specifies the means of communication and expected issues.

NVFCS has not identified disadvantaged stakeholders as all the identified stakeholders have equal opportunity for participating in the process. NVFCS also provided resources that would cover Working Group members' participation in the process. In addition, a significant part of the Working Group meetings took place as online meeting due to coronavirus situation in the country. This significantly decreased members' resources on travelling and participation. There are no other factors (language, cultural factors) that would disadvantage some stakeholders in Ukraine from participation in the process.

NVFCS developed detailed and highly challenging procedures for the NVFCS to engage with relevant stakeholders (UA SFM GD 02) that require a comprehensive approach in planning and implementing stakeholder engagement activities and its reporting. The procedures comprehensively cover stakeholders' engagement activities that focus not only on the standard setting process but the overall governance of the scheme.

It should be noted that UA SFM GD 02 and UA SFM TD 06 have been amended during the assessment process to distinguish between the procedural document (UA SFM GD 02) and stakeholder mapping document (UA SFM TD 06).

Announcement of the standard setting process

The announcement of the start of the process was made on several websites and at the NVFCS's Facebook profiles:

- On 15 December 2019, the applicant published at its website a formal announcement of the standard setting process and invitation to stakeholders to participate in it^[4].
- On 18 December 2019, the public announcement was published at the website of the "Society of Foresters of Ukraine"^[5].
- On 16 December 2019, the applicant sent individual e-mails to all stakeholders (91) identified in the stakeholders mapping. The email included a link to the applicant's website and a document with the public announcement^[26].

The announcement, respectively invitation to nominate representative to the WG, did not include invitation to stakeholders to comment on the proposed standard setting process (see the description of the minor non-conformity).

Working group for the development of SFM standard (WG)

The development of the forest management standard was led by the Working Group that consisted of 12 members equally divided into 6 stakeholder groups (See Annex E). In addition, the Working Group was also supported by consultants and experts. No single group dominated the process neither any of the group was dominated by others.

NVFCS received 10 nominations for the Working Group that were all accepted. Two women representing the NVFCS itself were added to the Working Group to represent the subgroup "Women and children" and to build overall gender balance within the Working Group. Later

in the process (April 2020), those two NVFCS's representatives were replaced by another women, stakeholders' representatives.

The Working Group members have vast knowledge and practical experience in forest management and are well-respected personalities within their sector and stakeholder group. The Working Group also includes two (respectively three) members representing a scientific community.

Affected stakeholders, mainly forest management organisations and workers representatives are well represented.

Working group composition		
Subgroup	Member	Stakeholder organisation
Forest management bodies	Olexander Vasylovych Rybak	State Agency of Forest Resources of Ukraine
	Lyubov Fedorivna Korchinska	Korostyshevsky Forestry Agro-Industrial Complex
Business and industry	Yuriy Serafymovych Medvedev	Mebelderevprom Association (woodworking industry association)
	Mykola Vasylovych Kogut	Association of Woodworkers and Loggers of Lviv Region
Non-governmental organizations	Petro Sergiyovych Testov	Environment-People-Law (E-NGO)
	Yuriy Mykolaiovych Marchuk	National University of Life and Environmental Sciences Society of Foresters of Ukraine
Scientific and technological community	Nataliya Volodymyrivna Buyskikh	National University of Life and Environmental Sciences of Ukraine
	Igor Mykolaiovych Litsur	Institute of Environmental Economics and Sustainable Development of the National Academy of Sciences of Ukraine
Workers and trade unions,	Lyudmyla Ivanivna Makogonchuk	Trade Union of Forestry Workers of Ukraine
	Oleg Mykolaiovych Ryzhov	State-Owned Enterprise Belotserkovske Forestry
Women and children	Mariya Mykolaivna Maha	NVFCC
	replaced by Valentyna Lvivna Meshkova	Ukrainian Research Institute of Forestry and Forest Melioration
	Alla Eduardivna Obors'ka	NVFCS
	replaced by Yuliya Yuriivna Tsukanova	Hub Educational Institution Zhukyn

Open and transparent work of WG

The Working Group met five (5) times during January 2020 and June 2020.

Based on review of the submitted documentation (Appendices 5, 6, 7, 9 and 12 of the Development Report) as well as online interviews of the Working Group members, the following conclusions concerning the Working Group engagement in the process can be made:

- The Working Group met 5 times during the period between January 2020 and June 2020. Two of the meetings were two days meetings.
- The meetings were well organised with clearly written and communicated agenda for each meeting.
- The meetings were well attended by members of the working group (full participation or 11 out of 12) as well as a number of experts, consultants and observers.
- Consultants and experts were used to draft the standard, and integrate results of discussion and outcomes of the Working Group meetings into a new draft.
- The meetings were well and comprehensively recorded in official minutes that were made available to the Working Group members.
- The results of the meeting were also very well communicated to other stakeholders, not only at the NVFCS website but also at the Facebook, other organisations' websites and full recording of the meetings were available at the NVFCS's Youtube channel.
- The meetings provided sufficient time for discussion between its members.

The standard was developed and discussed within very short time (from 15/01/2020 until 10/6/2020) with five meetings being organized during that period. This setting provided very limited time in between the individual meetings. Therefore, the time availability could have a negative impact on robustness of the process, discussion and negotiation between stakeholders. However, it should be noted that the process was well supported by external experts and consultants that were preparing the necessary analysis and proposals for the Working Group. This allowed a smooth and professionally run standard setting process (see observation relating to this issue).

Public consultation

PEFC Ukraine organised two public consultations.

The **first public consultation** took place from 25 February 2020 until 24 April 2020. The announcement was made at the applicant's website^[10] prior to the start of the public consultation; at the applicant Facebook^[11] and at the Facebook's public group "Forest Lovers of Ukraine"^[12]. The announcement for the public consultation was also distributed by E-mail^[13] to all stakeholders (91) that were identified in the stakeholders mapping (Appendix 4 to the Development Report, UA SFM TD 06).

NVFCS planned to organise a public seminar. However, due to coronavirus restrictions, the promotional activities were moved into Facebook discussion.

As a result of the first round of public consultation, the NVFCS received 101 comments from 6 organisations/individuals^[15]. The Working Group considered the comments at its meeting held on 28-30 April 2020 (Appendix 9 to the Development Report). On 4/5/2020, the applicant published at its website an announcement^[14] on the end of the public consultation with links to the synopsis of received comments and their consideration (Appendix 8 to the Development Report) and a summary report on the public consultation^[15]. Out of 101

comments, 31 were accepted, 20 were partially accepted, 14 were noted and 36 were rejected with notification^[15]. All stakeholders that submitted their comments received an individual e-mail with the result of the comments' consideration^[28].

All received comments and their consideration were compiled in a single document and made publicly available at the applicant's website. In addition, the Working Group also prepared a summary report on the public consultation.

On 5/5/2020, the applicant announced at its website^[16] a **second public consultation** lasting from 6/5/2020 until 4/6/2020 (30 days). The second public consultation was also communicated by E-mail^[18] to all identified stakeholders (Appendix 4 to the Development report, UA SFM TD 06) and posted at the applicant's Facebook^[17].

The Working Group considered at its meeting on 9-10/6/2020 (Appendix 11 of the Development Report) all comments received from the second public consultation. In total, the NVFCS received 41 comments from 15 organisations/individuals, 17 comments were accepted, 7 were partially accepted, 13 were noted and 4 were rejected with justification^[20]. All stakeholders that submitted their comments received an individual e-mail with the result of the comments' consideration^[28].

On 16/06/2020, the applicant published at its website an announcement^[19] on the end of the second public consultation with a link to the summary of the received comments and their consideration (Appendix 10 to the Development Report) as well as a summary report on the public consultation^[20].

Pilot testing

Following tender procedures, the applicant has selected SGS and Legalis LLC (certification bodies) to conduct pilot testing on three forest enterprises (Korostyshiv forestry Agroindustrial Complex, Perechyn Forest Enterprise and Bereshanske forest enterprise)^[21].

The scope of the pilot testing was evaluated by the assessor based on the report prepared by Legalis LLC for two forest enterprises (Appendix 11 to the Development Report). The pilot testing comprehensively evaluated forest management against all requirements of the draft forest management standard (version 20/4/2020).

The pilot testing took three days for each forest enterprise and the audit team consisted of three experienced auditors. The audits included stakeholders' consultation, office audit as well as a field audit.

The report identified compliance with the draft standard, recommendations for interpretations and improvement of the standard and as well as consistency with legislation.

The results of the field audit were considered by the Working Group on 9-10/6/2020 (Appendix 12 to the Development Report). The results of the pilot testing were also communicated at the applicant's website^[22].

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

At its fifth meeting held on 9-10/6/2020, the Working Group decided to make final changes to the standard where members of the Working Group will be expressing their support to the standard by e-mail (Appendix 12 to the Development Report).

The applicant received a positive vote from all members of the Working Group^[9].

Formal approval of the SFM standard and its publication

The General Meeting of the NVFCS formally approved the standard on 24 June 2020 (Appendix 13 to the Development Report).

The forest management standard as well as the whole scheme documentation is publicly available from the applicant's website^[23].

The applicant announced the formal approval of the standard at its website on 26/6/2020 with a link to the approved standard^[24].

It should be noted that during the assessment process, the NVFCS decided to make minor modifications to the forest management standard. The changes were agreed by the Working Group and then formally approved by the General Assembly of the NVFCS on 25 February 2021.

Results of the assessment of the standard setting process

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

PEFC requirement	6.3.1e: Announcement of the process' start – invitation of stakeholders to comment on the process
Type	Minor non-conformity
Description	<p>The announcement did not include an explicit invitation to stakeholders to comment on the proposed scope and standard-setting activities.</p> <p>However, it should be noted that a number of organisations active in forestry sector of Ukraine had been consulted prior to the formal start of the standard setting process (Dec 2020). This included the national standardisation body, Society of Foresters of Ukraine, State Agency of Forest Resources of Ukraine, business representatives. Their views have been considered when designing the standard setting process itself.</p> <p>In addition, as a part of the reminder of the 1st public consultation on the enquiry draft of the forest management standard (24 March 2020) ^[27], the NVFCS also invited stakeholders to comment on the standard setting process. The NVFCS has received no comment relating to the standard setting process. It can be assumed that if the NVFCS have received a comment, it could have still had possibility to respond to the comment by amending the later stages of the standard setting process.</p>

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

Length of the standard setting process

The standard was developed and discussed within very short time (from 15/01/2020 until 10/6/2020) with some meetings organized in very short time period in between them. In addition, during this 5-month period, two public consultations were run and a pilot testing took place.

Therefore, the time availability could potentially have a negative impact on robustness of the process, discussion and negotiation between stakeholders.

The topics was intensively discussed with the NVFCS representatives as well as members of the Working Group. They all confirmed that the time for the standard setting was sufficient taking into account the following facts:

- The debate on the draft standards started between some stakeholders already in 2019, well before the formal start of the process;
- The first draft of the standard was developed well prior to the start of the process by experts;
- The whole process was supported by experts and consultants that were working in between the meetings to provide the Working Group with options and solutions;
- The COVID restrictions allowed the Working Group members to dedicate more time to the standard setting and online meetings.

Stakeholders mapping

The applicant identified all stakeholders as “key” based on level of interaction that was assessed for individual subgroups. This would satisfy the letter of the PEFC requirement, however, lacks the purpose of the approach itself. The purpose of the identification of “key stakeholders” is to recognise that different organisations/individuals have different importance in the standard-setting process and that level of engagement should reflect this fact. However, as the applicant made the classification for stakeholders’ subgroups, all subgroups were naturally considered as “key” and thus all stakeholders were considered as key. The applicant’s approach then does not allow differentiating between stakeholders within the subgroups.

Stakeholders engagement

The applicant has developed a comprehensive guidance on the stakeholders’ engagement (UA SFM TD 02) that exceeds the PEFC Council’s requirements, especially in planning and reporting on the stakeholders’ engagement. It should be noted that the scope of the document exceeds a time horizon of the standard setting process and also relates to the governance of the scheme in between the periodic reviews/revisions. Therefore, not all procedures of the document are applicable to the standard-setting, haven’t been implemented as a part of the standard setting; and are over and above the scope of this assessment.

8.2.3 Stakeholders interview - questionnaire

TJConsulting distributed a questionnaire to more than 90 stakeholders in Ukraine that covered all stakeholder groups relevant to sustainable forest management with a request to provide feedback on the standard setting/revision process of the scheme.

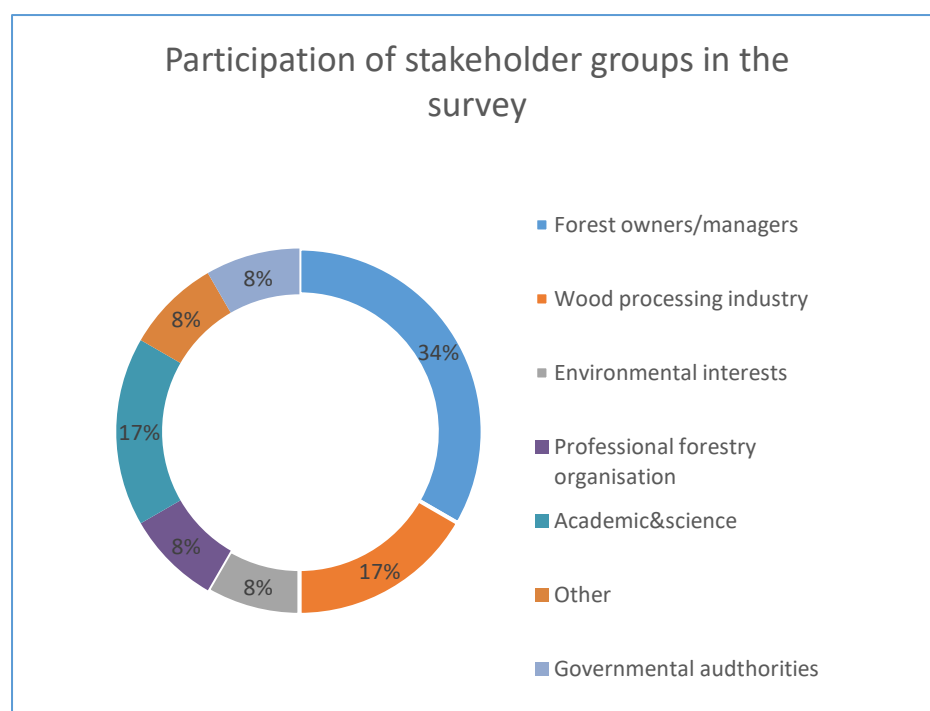
TJConsulting provided stakeholders with a four (4) weeks response period between 25 January and 27 February 2021 but also responses submitted after the deadline were considered. Also, responses made during online interviews were used to complete the respondents' contribution in the questionnaire. The questionnaire was also translated into the Ukraine language and distributed to stakeholders. Questionnaires received in both English as well as Ukraine language were considered.

The results of the survey were taken into consideration in the scheme assessment. However, it should be noted that any interpretation of the survey results should take into consideration the limited number of received responses and the fact that the responses are not balanced according to stakeholders' categories.

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

Participation in the stakeholders' survey

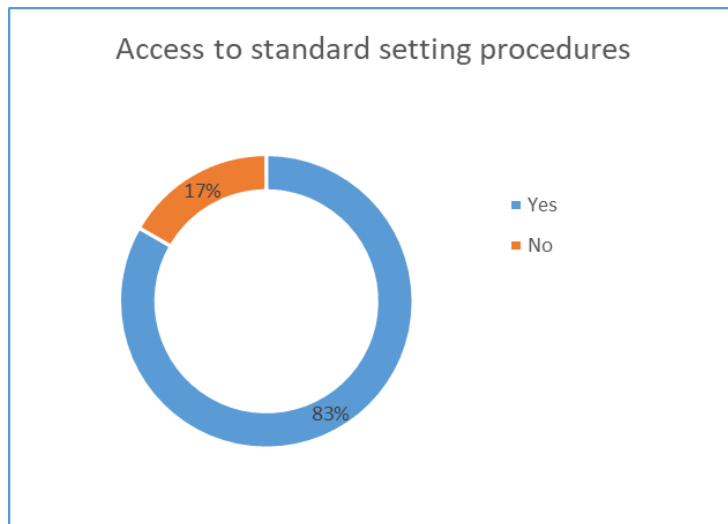
12 respondents submitted their responses representing forest owners / managers (4), wood processing industry (2), E-NGOs (1), academic&science (2), Professional forestry organization (1), state forest administration (1) and other stakeholders (1).



Access to standard setting procedures

A majority of respondents (10) indicated that they had had an access to the standard setting procedures. Two respondents answered that they didn't have access to the procedures. However, those respondents also replied that they have noticed the public announcement of the standard setting process which included references to the standard setting procedures.

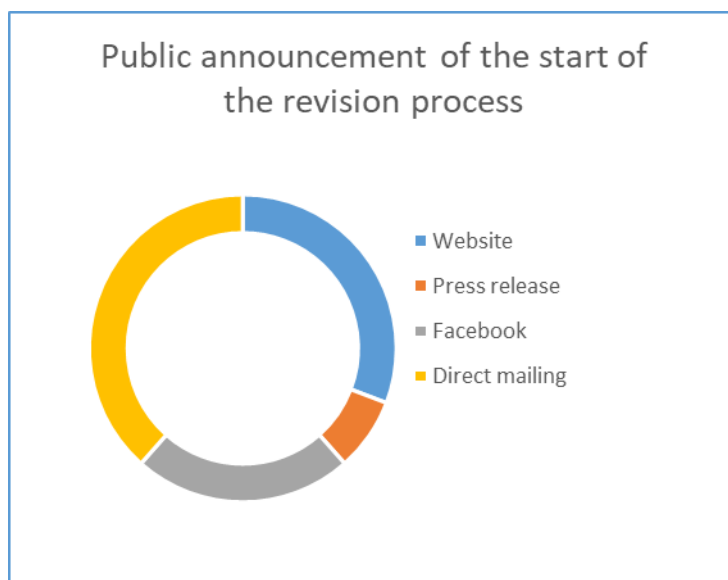
The issue was verified and the public announcement published at the applicant's website included a link to the procedures and they were freely available from the website.



Public announcement of the start of the revision process

A majority of respondents (11) responded that they have had noticed the public announcement of the start of the revision process. The direct mailing (10) was the most efficient mean of communication, followed by the website (8), Facebook (6) and press release (the respondents could make multiple choices).

One stakeholder indicated that the announcement has not been noticed.



Invitation to nominate representatives to the Working Group

The majority responses (9) indicated in the questionnaire that they have had received an invitation to participate in the Working Group, the standard setting body responsible for the development of the forest management Standard. Three (3) respondents stated that they have received no invitation. However, it should be noted that the same stakeholders responded that they have noticed announcement either at the website or by direct mailing. Both included an explicit invitation to submit nomination.

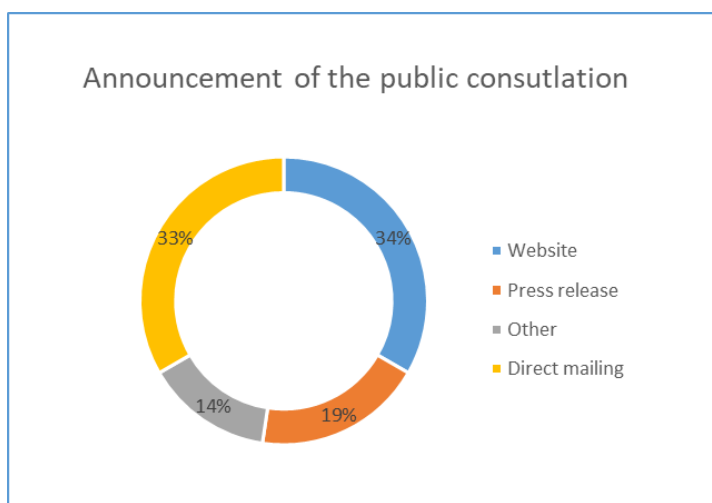
Also, the direct mailing was checked and the stakeholders' addresses were involved.



Announcement of the public consultation

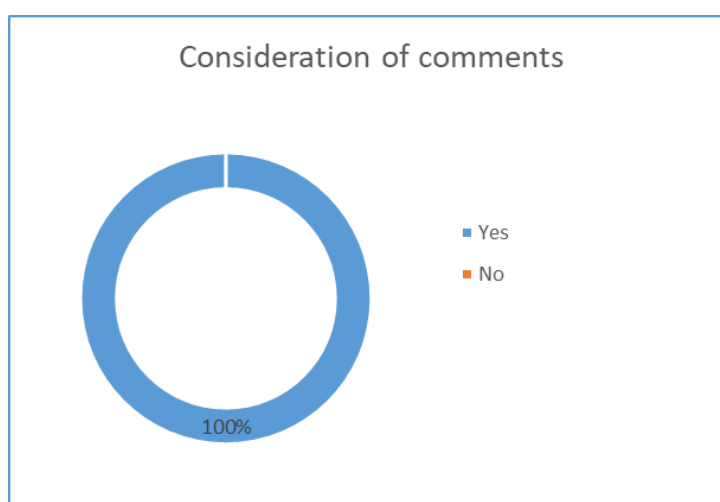
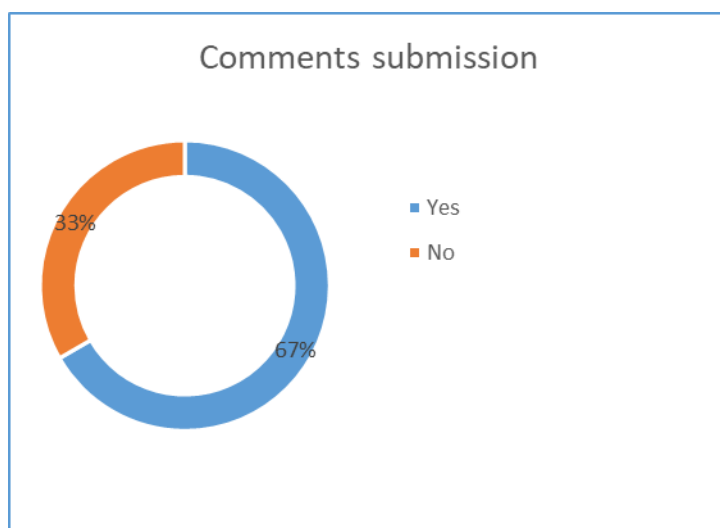
A majority of respondents (10) indicated that they had had noticed an announcement of the public consultation; direct mailing (7), website (7), other media / magazines (4) and press release (3) were quoted as the main communication channel.

However, one respondent made reference to the PEFC International Consultation organized as a part of the endorsement process and one respondent stated that the invitation reached him at the end of the public consultation.



Consideration of comments from public consultation

Eight (8) respondents indicated that they had submitted comments during the public consultation and that their comments have been considered by the Working Group.



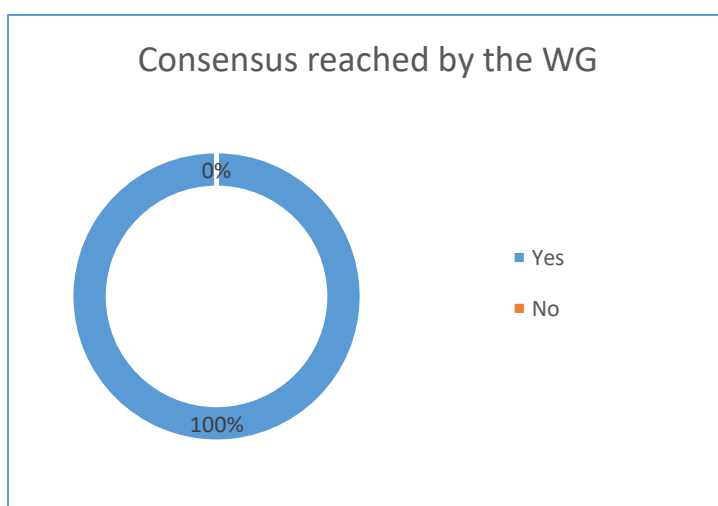
Submission of complaints

All respondents (12) indicated that they had not submitted to NVFCS a complaint relating to the standard setting process.



Open and transparent work of the Working Group and consensus reached by the Working Group

Ten (9) respondents that have had participated in the Working Group responded that its work had been open and transparent and that the Working Group had reached consensus.



General comments

Some respondents (3), including an E-NGO, provided a general comment that the process was well organized, participatory and consensus driven.

8.3 Requirements for group forest management certification

8.3.1 Introduction

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

The requirements for the group certification are defined in UA SFM ST 03. It should be noted that in order to resolve two minor non-conformities identified in a draft interim report, the applicant introduced small amendments to UA SFM ST 03 and published the document as “second edition”.

The group certification model is based on a group of participants (forest owners/managers) that is managed and controlled by a “group entity”. Concerning the structure of the requirements for the group forest management certification, UA SFM ST 03 uses the ISO High Level Standard structure (HLS) for management system that is also basis for PEFC ST 1002:2018.

Also, the text of UA SFM ST 03 is largely identical with PEFC ST 1002:2018.

8.3.2 Group certification model

The approach for a number of requirements of UA SFM ST 03 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)

The requirements for **participants** contain:

- a) Written commitment to comply with certification requirements;
- b) Compliance with SFM and other scheme requirements;
- c) Co-operation and assistance in the certification process;
- d) Implementation of corrective and preventive measures;
- e) To inform the group entity about any previous certification and non-conformities.

Internal audit programme

Sample size: The size of the sample should generally be the square root of the number of participants: ($y=\sqrt{x}$) that can be reduce by a factor of 0.8 if specific conditions have been met.

Sample categories: A multicriterial risk assessment methodology is described in Appendix B of the group certification standard. It requires to evaluate a risk for each participant based

on predefined criteria and appoint a numerical score (0-low risk, 1-medium, 2-low) for each criterion. The total risk score for each participant is then calculated as a sum of risk scores for each criterion.

Three sample categories are then defined based on a total risk score: 1-5 = low risk category, 5-10 medium risk category, 15+ high risk category.

Share of the sample categories in the total sample: The document defines percentages from the total size of the sample to be included in each of the sampling category while categories with higher risk are have higher representation in the sample than categories with lower risk (9.3.5.3-9.3.5.5).

Results of the evaluation

The Ukraine scheme's requirements for group forest management certification (UA SFM ST 03) **comply** with the PEFC requirements (PEFC ST 1002:2018).

8.4 Detailed assessment of the forest management standard

8.4.1 Introduction and summary

Structure of the Standard

The requirements for the sustainable forest management are defined in UA SFM ST 02.

The document is structure in accordance with the ISO High Level Standard structure for management systems and thus also follows the structure of PEFC ST 1003:2018.

The general management system requirements are largely identical with PEFC ST 1003:2018.

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. For each of the criterion the first level requirements are largely identical with the requirements of PEFC ST 1003:2018. The second level of requirements provides detailed performance-based and measurable indicators or means of verification.

Criterion		Number of requirements (1 st level)	Number of indicators (2 nd level)
1	Maintenance of capacity of the forest resources and their contribution to global carbon cycles.	6	18
2.	Maintaining the vitality, health and protective functions of forest ecosystems	5	34
3.	Maintenance and promoting productive functions of forests	5	9
4	Maintenance, protection and possible improvement of biological diversity in forest ecosystems	13	40
5.	Applicable international, national and local legislation and forest management	5	15
6	Maintenance of socio-economic conditions and functions of forests	7	13
Total number		47	129

Management cycle and continuous improvement

The standard includes detailed 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.

Appendix B to the standard then includes detailed requirements for monitoring for forest management operations.

Compliance with legislation

The standard requires 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 applicable royalties and taxes.
- h. other legal requirements.

The standard also requires to implement anti-corruption measures in compliance with the anti-corruption legislation.

The standard also requires to protect forests from illegal activities of third parties.

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 Ukraine scheme’s SFM standard requirements (UA SFM ST 02) in relation with key areas of sustainable forest management defined by PEFC ST 1003:2018.

It should be noted that UA SFM ST 02 was revised during the assessment and a few minor amendments have been incorporated to resolve minor non-conformities identified in the draft interim report. This includes elaboration of a new document (UA SFM TD 09) with derogations for highly hazardous pesticides.

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 is 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

The following tables include a summary of the Ukraine SFM Standard (UA SFM ST 02) with the PEFC requirements. Detailed assessment is included in Annex C.

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. The standard defines that it applies to all entities operating on defined area. It requires records keeping (4.1).

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

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

The standard states that forest owner/manager with PEFC-recognised certificate issued against the Standard shall use PEFC claims “100% PEFC certified” (4.1).

PEFC claims can only be made for products originating in PEFC certified forests and by entity with the recognised certificate issued against the Standard (4.1).

The Standard requires to provide in the sales documents information as required by PEFC ST 2002:2020 (4.1).

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

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

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 (6.1.2), defines requirements for periodically updated forest management plan and its public availability (6.2).

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 and access to applicable legislation, and compliance with it (6.3.1). This includes legislation on corruption and protection of the forest from unauthorised activities of third parties.

The Standard includes a requirement for legal rights, property and forest use rights (6.3.2) and human rights (6.3.2.3).

The Standard requires compliance with fundamental ILO Conventions that are listed in Annex A of the Standard.

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

The Standard requires to identify health and safety related risks and implementation of measures to mitigate those risks. Employees shall be informed about the risks (6.3.4.4).

The Standard requires safe working conditions, health and safety relating training as well as controls. The Standard also requires service provides obligations relating to the health and safety (6.3.4.2)

The Standard includes requirements for wages to be in compliance with legislation and collective agreements that applies to local, migrant workers and contractors (6.3.4.3), and requires equal employment opportunities (6.3.4.4).

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

The Standard includes requirements for resources, internal as well as external. equal opportunities and non-discrimination. and contractors (7.1).

The Standard includes requirement for competence of employees as well as contractors, including identification of competence needed, control, on-going training, competence maintenance and improvement, and records-keeping (7.2).

The Standard includes requirements for communication and consultation with local communities and other stakeholders. It also includes requirements for stakeholders engagement, identification of issues and communication channels, and transparent stakeholders consultation (7.3).

The Standard includes requirements for complaints and dispute settlements and public availability of such mechanisms (7.4).

The Standard includes requirements for relevant and updated documented information (7.5).

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

The Standard includes requirements for maintaining forest area and tree vegetation. Forest practices shall respect different forest categories and their functions and forest services shall be maintained and improved (8.1.1).

The Standard includes requirements for maintaining the quality and quantity of forest resources by defining an annual allowable cut, maintenance of the growing stock, preference to the selective and gradual silvicultural systems and consideration of natural conditions when planning forestry activities (8.1.2).

The Standard includes requirements for climate positive practices, including efficient use of resources, minimisation of damages to the growing trees, restriction on burning forest debris and prevention and control of forest fires (8.1.3)

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

The Standard includes requirements prohibiting forest conversion. The criterion of “justified circumstances” allowing exemptional conversion are identical with the PEFC requirement (8.1.4).

The Standard includes requirements restricting conversion of severely damaged forests that are identical with the PEFC requirement (8.1.6).

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

The Standard includes requirements prohibiting afforestation of ecologically important non-forest ecosystems. The criterion of “justified circumstances” allowing exemptional conversion are identical with the PEFC requirement (8.1.5).

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

The Standard includes requirements for maintenance and enhancement of forest health and vitality by formation of mixed multilayer stands, promotion of native forests, restoration of degraded forests, control of non-timber harvesting and control of cattle grazing and hay harvesting (8.2.1).

The Standard includes requirements for maintenance and enhancement of forest health and vitality by formation of mixed multilayer stands, promotion of native forests, restoration of degraded forests, control of non-timber harvesting, control of cattle grazing and hay harvesting and supporting adequate genetic, species and structural diversity (8.2.2).

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 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, waste management, and for avoidance of spillage of oil or fuel (8.2.5).

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

The Standard includes requirements for integrated pest management and for restricted use of biological control agents (8.2.6).

The Standard includes requirements for controlled use of pesticides (8.2.7), prohibits the use of WHO 1A and 1B pesticides (8.2.8). General criteria for any exemption are defined directly in the Standard and derogations are included in UA SFM TD 09. Two listed substances are only allowed to be used in forest nurseries (Benomyl and Malathion). The only substance for forest use (Alfa-cypermethrin) is approved in EU and is as well derogated by FSC for a number of countries.

The Standard prohibits the usage of chlorinated hydrocarbons and any other pesticides banned by international agreements (8.2.9).

The Standard includes requirements for the proper use of pesticides, adherence to the producer's instructions, usage of proper equipment and training (8.2.10).

The Standard includes requirements that restricts the use of fertilisers, including ban on using fertilisers as a part of the soil nutrient management (8.2.11).

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 (8.3.1). The Standard includes requirements for sound economic performance (8.3.2).

The Standard includes requirements for forest operations being carried out in time and not reducing production capacity of forests (8.3.3).

Sustainable production (PEFC ST 1003:2018, 8.3.4)

The Standard includes requirements for sustainable level of harvesting, including conducting forest inventory, analysis of forest increment and sustainable harvesting of both timber and non-wood forest products. (8.3.4).

Forest infrastructure (PEFC ST 1003:2018, 8.3.5)

The Standard includes requirements building and maintaining forest infrastructure, and minimisation of its negative impacts on biodiversity, soil and water, including public availability of planning instruments, authorities' permissions, competent and authorised construction companies, assessment of potential damages to the environment (8.3.5, 8.4.11, 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 different levels. (8.4.1).

The Standard includes prohibits commercial use of protected and endangered species and provides additional requirements for protection of those species and their habitats (8.4.3).

The Standard includes requirements promoting horizontal and vertical diversity of forest stands, mixed forests and landscape diversity, including limitation on clearcutting, promotion of shelter-based silviculture system, protection of aboriginal species, etc. (8.4.8).

The Standard includes requirements promoting traditional management systems, leading to native forest ecosystems from aboriginal species (8.4.9).

The Standard includes requirements logging operations to avoid damages to soil, remaining trees and water resources, cultural and other protected sites (8.4.10).

The Standard includes requirements for control of damages caused by animal population, especially in reforestation and afforestation (8.4.12).

Ecologically important biotops (PEFC ST 1003:2018, 8.4.1)

The Standard includes requirements for inventory, mapping and protection of ecologically important forest areas, including management restrictions in those areas (8.4.2).

The definition of the term “Ecologically important forest areas” (3.9) is identical with the definition of PEFC ST 1003:2018 while UA SFM ST 02 provides interpretation of different categories in local, Ukraine conditions.

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

The Standard includes requirements for successful regeneration, with preference to the natural regeneration and reforestation being carried out in required extent and time (8.4.4).

The Standard includes requirements use of local species and for restricted use of introduced species, including scientific evaluation of their impact, evidence on safety of their usage, monitoring and control of expansion of invasive introduced species and establishment of plantations of introduced species only as a result of afforestation (8.4.5).

The Standard includes improvement of ecological connectivity by identification of suitable areas and their reforestation or afforestation (8.4.6).

The Standard prohibits the use of genetically modified organisms. The definition of the genetically modified organisms is identical with the definition made in PEFC ST 1003:2018 (8.4.7).

Dead wood (PEFC ST 1003:2018, 8.4.13)

The Standard includes requirements for standing and fallen dead wood, old growth and rare trees species, including specification of protected elements, their identification in technological charts and protection during harvesting (8.4.2).

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, including identification of such forests, planning and implementing appropriate measure and management in unfavourable forest sites (8.5.1, 8.5.2).

The Standard includes requirements for protection of soil against erosion, including restriction on usages of technologies and machinery, identification of the erosion control measures in technological charts, during and after harvesting operations (8.5.3).

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

The Standard includes requirements for protection of sites with protective functions for society, including identification of such forests, planning and implementing appropriate measure and management in unfavourable forest sites (8.5.1, 8.5.2).

The Standard includes requirements for water protection, including creation of buffer zones and protection of water courses from logging residues (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 promoting local economy and employment, including identification of resources and services that can strengthen the local economy (8.6.6).

The Standard ensure 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 as well as areas fundamental to meeting needs of local communities, including consultation and engagement of the local communities in identification of appropriate measures (8.6.3).

The Standard includes requirements for promoting long-term health of local communities, including engagement with local communities and resolution of conflicts (8.6.4) and requires the best use of local related knowledge (8.6.5)

Research (PEFC ST 1003:2018, 8.6.7)

The Standard includes requirements promoting research activities by providing cooperation and data to scientific institutions (8.6.7)

Monitoring (PEFC ST 1003:2018, 9.1)

The Standard includes requirement for monitoring of forest resources that is identical to the PEFC requirement (9.1.1). In addition, Annex B includes a list of processes that shall be monitored.

The Standard includes requirement for monitoring of forest health and vitality (9.1.2) and use of non-wood forest products (9.1.3).

The Standard includes requirement for monitoring of working conditions (9.1.4)

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

UA SFM ST 02 and UA SFM TD 09 comply with PEFC ST 1003:2018.

Observation (that do not represent non-conformity with the PEFC requirements)

Definition of the terms “natural” and “semi-natural” forests

Although the term “natural” and “semi-natural” forests that are relevant to the definition of “forest conversion” are defined in external documents (including legislation), the relevant definitions should be included directly in the Standard.

Quality of translation

In some cases, the translation into English could be improved. For example, although the term “aboriginal” is synonymous to “native” or “indigenous”, in connection with plant species it is more common to use the term “native”. Another example is the use of the term “non-timber forests products” and “non-wood forest products”. Although the terms are synonymous, the Standard should only use one term, especially when included in chapter “Terms and Definitions”.

However, none of those translation issues could result in different interpretations of the requirements.

It should be also noted that the original Ukraine text that has been negotiated and agreed by stakeholders and that will be used in the certification process is using an appropriate terminology.

8.5 Assessment of the 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 and PEFC ST 2003:2020 that were adopted by NVFCS 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.

- NVFCS submitted a document identified as PEFC ST 2002:2020 whose front page includes information about a formal adoption of the document by NVFCS. The remaining pages of the document are identical with PEFC ST 2002:2020 as adopted by the PEFC Council.
- The international PEFC chain of custody standard is correctly referenced in the PEFC Ukraine notification procedures (UA SFM ST 06) and the notification contract (Annex to UA SFM ST 06).

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 and indirectly through mandatory references in the notification procedures (UA SFM ST 06).

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8.6 Requirements for certification bodies

8.6.1 Requirements for chain of custody certification bodies

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

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

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

- NVFCS submitted a document identified as PEFC ST 2003:2020 whose front page includes information about a formal adoption of the document by NVFCS. The remaining pages of the document are identical with PEFC ST 2003:2020 as adopted by the PEFC Council.
- The international PEFC ST 2003:2020 is correctly referenced in the PEFC Ukraine notification procedures (UA SFM ST 06) and the notification contract (Annex to UA SFM ST 06)

The scheme satisfies the PEFC requirements for certification bodies operating chain of custody certification.

8.6.2 Assessment of requirements for forest management certification bodies

8.6.2.1 Introduction and summary

Coverage and scope of requirements

The requirements for certification bodies for forest management certification are described in UA SFM ST 05.

Structure of the document (UA SFM ST 05)

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

- a) General requirements;
- b) Structure requirements;
- c) Resources requirements;
- d) Information Requirements,
- e) Process requirements;
- f) Management system requirements;
- g) Payments for work;
- h) Work language;
- i) Accreditation;
- j) Notification.

In addition, it also includes three (3) appendices: A1 defining certificate content, A2 with group forest management certification requirements and A3 focused on content of an audit report.

Certification and accreditation framework

UA SFM ST 05 is based on and makes mandatory reference to ISO 17021-1 and as such considers the forest management certification as the “management system certification”.

UA SFM ST 05 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.

Competencies of the certification body and auditors

UA SFM ST 05 requires that the certification body shall have competencies in forest management and the Ukraine forest certification scheme.

The document includes comprehensive requirements for auditors, including their education, working experience, training, competences and knowledge and requires a specific attestation by an organisation appointed by the applicant.

Those requirements are meeting and significantly exceeding the PEFC requirements.

Stakeholders' consultation

UA SFM ST 05 requires employees but also 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

UA SFM ST 05 requires that the certification body prepares and makes publicly available a summary of the certification report at its website.

Notification of certification bodies

UA SFM ST 05 requires that the certification bodies for forest management certification shall be notified by NVFCS. UA SFM ST 05 includes conditions for the notification and provides a specimen of the notification contract that are not deemed discriminatory.

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.

8.7 Evaluation of impact of the “EarthSight” report findings on the applicant scheme

8.7.1 Introduction

In 2018, the EarthSight, a UK based non-profit organisation, published a report “Complicit Corruption”⁶ with numerous allegations relating to illegal logging and corruption in forestry sector and timber trade in Ukraine. The report connects the illegal and corrupted practices in Ukraine to organisations responsible for forest management, state forest administration, custom administration, timber traders and finally to large international buyers and manufacturers of timber located within the EU. The report also analysis the role of FSC (the Forest Stewardship Council) and the certification scheme’s capability to detect and prevent the alleged illegal activities.

Incorporation of this element in the assessment is included in the assessor’s tender proposal and agreed by the PEFC Council.

8.7.2 Objective

The objective of the evaluation is to establish to what extent the assessed Ukraine scheme can respond to the allegations made by the EarthSight report, i.e. its ability to prevent or detect the described illegal and corrupted activities⁷.

This analysis only focuses on those activities that relate to organisations that are responsible for forest management, including sale of timber by those organisations. The analysis does not cover corrupted and illegal activities that are linked to organisations down the supply chain, including traders, manufacturers and buyers of wood-based products. Those activities can only be tackled by the PEFC chain of custody certification, including its requirements for due diligence and the NVFCS does not have mechanisms how to amend the respective PEFC international standards⁸.

8.7.3 The EarthSight report findings and potential responses by the scheme

The following table lists the key findings of the EarthSight report and describes how the assessed scheme can theoretically respond, prevent or detect the identified corrupted and illegal activities. Finally, it also provides the assessor’s hypothetical judgement⁹ on likelihood that the alleged activities could happen in forests that would be certified by the scheme.

However, it should also be noted corruption, especially when spread throughout the public authorities and society in general cannot be resolved by certification scheme itself as it requires changes in legislation, operation of public authorities, juridical system, and society’s awareness and acceptance of the corrupted activities.

⁶ COMPLICIT IN CORRUPTION, How billion-dollar firms and EU governments are failing Ukraine’s forests, 2018, www.earthsight.org.uk

⁷ The objective of this assessment is not to evaluate or judge the correctness of claims made by the EarthSight report

⁸ PEFC ST 2002:2020 and PEFC ST 2003:2020

⁹ There is no forests Ukraine certified against the scheme. Additionally the scheme’s ability to detect the identified illegal practices significantly depends on implementation of the scheme’s requirements, especially then performance of auditors, certification and accreditation processes. Therefore, the judgement needs to be considered as “hypothetical”.

EarthSight report allegations	Potential response by the scheme	Likelihood that the activities would be prevented by the certification against the scheme
State forest enterprise selling timber at discounted price subject of its corrupted officials being bribed by timber buyers		The scheme includes only general requirement that the Organisation shall identify the applicable legislation and its impact on the Organisation's operations (UA SFM ST 02, 6.3.1.2).
State forest enterprise selling timber to illegal "shadow" sawmills that are not authorised to operate in Ukraine	<p>UA SFM ST 02 includes a requirement 6.3.1.2: "The Organisation shall comply with the requirements of current legislation on management issues, taking into account local (regional) conditions, including to: f) anti-corruption".</p> <p>UA SFM ST 02, 6.3.1.3: "The Organisation shall develop measures to reduce the corruption risk in accordance with anti-corruption legislation".</p>	<p>It lists "anti-corruption legislation" amongst the areas of applicable legislation and requires the Organisation to develop measures to reduce the corruption in accordance with the anti-corruption legislation.</p> <p>However, (i) the standard itself does not define any measurable specific anti-corruption measures, (ii) the quality of the anti-corruption legislation is unknown and uncertain; (iii) the auditors' knowledge and awareness of the anti-corruption legislation is uncertain; (iv) taking into account the extremely large extent of "applicable legislation" it is questionable whether an audit would be able to detect the corrupted activities and behaviour, especially when conducted by senior officials.</p>
<p>Illegal activities in sanitary fellings</p> <p>This covers increase of harvested volumes by harvesting trees infected by bark beetle to avoid the pests to spread to other parts of the forests.</p> <p>The sanitary fellings results in total harvest significantly exceeding annual allowable cut (AAC).</p> <p>The sanitary felling does not require harvest permit. Forest management enterprises are using unnecessary sanitary fellings to increase harvest volumes. Although not allowed by legislation, the sanitary</p>	<p>UA SFM ST 02 requires that sanitary felling shall promote mixed stands, ensure gradual renewal and shall not remove native tree species (8.4.8.3-8.4.8.5), and shall minimise the risk of soil erosion (8.5.3.2).</p> <p>UA SFM ST 02 requires to identify and comply with applicable legislation.</p> <p>UA SFM ST 02 requires that "Timber harvesting volumes shall not exceed total average change in stock calculated for the forest inventory period, unless increase in harvesting is due to emergencies related to natural disasters" (8.1.2.2).</p>	<p>The standard requires to comply with applicable legislation and as such legislation compliance is an integral part of certification requirements.</p> <p>However, taking into account extent of all applicable legislation, it is questionable whether all fillings the requirements defined by legislation would be checked during the audits if the requirement is not explicitly stated in the standard.</p> <p>It is more likely that the certification body would only audit this specific legislation requirement if it receives information from external parties suggesting the non-compliance.</p> <p>The issue is even more difficult as there apparently exist different interpretations for sanitary fellings</p>

<p>fellings also took place in protected areas or in time of the silence period¹⁰.</p>		<p>during the silence periods between different authorities and E-NGOs¹¹. Fundamental for certification process would be which interpretation is followed by the certified entity and its certification body.</p> <p>It is likely that auditing and certification against the standard would not detect the cases where the sanitary felling is not conforming to the legislation or the certified entity/auditor would apply different interpretation of the legislation than E-NGOs/EarthSight. Scale of the sanitary fellings and awareness of stakeholders and their willingness to report illegalities to the certification body will be key factors for detecting the issue.</p>
<p>Cutting outside the boundaries of planned harvesting areas, and cutting more trees in a given area than permitted in the forest management plan. Dragging timber through streams.</p>	<p>In addition to the reference to legislation, UA SFM ST 02 includes number of requirements regulating harvest level and protection of water resources.</p>	<p>Harvesting is the most critical forest management activity and admittance to the forest management plan and harvesting volume should be regular object of the certification audits. The certification should be able to detect large scale or systemic failures and non-conformities with the standard.</p> <p>However, as auditing is based on sampling, it is likely that some cases would not be detected during audits.</p>
<p>Amber mining</p> <p>Forests are being felled in search of amber. Gangs, involving corrupted state officials clear-fell relevant areas before using high-pressure hoses to remove the soil and expose the amber, leaving a devastated, pockmarked landscape.</p>	<p>UA SFM ST 02: 6.3.1.4: "The 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".</p>	<p>The illegal mining is not explicitly covered by 6.3.1.4 although this could be covered by the term "other illegal activities". Taking into account the scale of the amber harvesting activities, those should be detected by forest managers (if not involved or benefiting from the activities) or even auditors.</p>
<p>Allegation against FSC</p> <p>The system cannot detect illegalities. Auditors are not forced to search for relevant information. This is only done when the</p>	<p>UA SFM ST 05, 9.2.4.2: "When determining the labour input of the audit, the certification body shall, among others, take into account the following:...</p>	<p>UA SFM ST 05, requires the certification body to use different sources of information. Those should be able to detect systemic failures or large-scale non-</p>

¹⁰ Those allegations are also subject to different interpretation of the Ukraine legislation by different authorities and E-NGOs.

¹¹ <https://fsc.org/en/newsfeed/fsc-statement-on-earthsight-report-2020>

<p>issue is raised by E-NGOs.</p>	<p>g) risks associated with the organisation's processes or activities and other factors. i) use of the Earth remote sensing methods;...".</p> <p>UA SFM ST 05, 9.5.4.2 "Methods of obtaining information include, in particular:</p> <p>a) interviews and polls of the organisation's employees and stakeholders (e.g. public institution, local government, environmental organisations, etc.) b) observation of processes and operations; d) analysis of documentation and records; e) collection and analysis of data on remote zoning of the Earth and data obtained with using unmanned aerial vehicles, other available external information (publications in mass media, court registers, etc.).</p>	<p>conformities with the certification requirements.</p> <p>However, it is unlikely that during very limited sampling and audit times, the certification body would be able to identify individual and isolated cases of illegal activities and failures.</p> <p>For that purpose, the certification body and the scheme itself should strengthen the role of stakeholders interview, in particular then local communities and E-NGOs and the use of remote aerial images and analysing information already existing in public domain (E-NGOs report, media monitoring).</p>
<p>Allegation against FSC</p> <p>Certification bodies are not doing rigorous enough assessments and FSC is failing to identify failings in the certification bodies assessments¹².</p>	<p>UA SFM ST 04, 9.9.2: "The certification body shall submit to the Association NVFCS reports on complaint investigation against the certified clients. The reports shall include the following information:</p> <p>a) name and contact information of the complainant; b) name and contact information of the defendant; c) subject matter of the complaint; d) summary of the complaint investigation process; e) decision made on the complaint".</p> <p>UA SFM ST 05, 9.2.4.2: "When determining the labour input of the audit, the certification body shall, among others, take into account the following:...</p> <p>g) risks associated with the organisation's processes or activities and other factors. i) use of the Earth remote sensing methods".</p>	

¹² <https://fsc-watch.com/2020/07/16/flatpacked-forests-faq-earthsight-responds-to-fsc/>

8.7.4 Precautionary approach to respond to the allegations

The conclusions and recommendations included in this chapter of the report go over and above the compliance with the PEFC benchmark requirements. However, taking into account the both the reputational as well as market impact on both the Ukraine scheme as well as PEFC International, the PEFC Council should consider those in its endorsement decision.

Regardless of the validity or justifications of allegations made in the Earthsight report, the scheme should be able to respond to the mentioned allegations. The scheme should have ability to detect the described types of illegal activities either directly in the certification activities or respond to reported illegal activities through accreditation process and/or complaints management at all levels.

Taking into account the specific situation in Ukraine as well as seriousness and consequences of such accusations, the scheme should adopt specific measures, even when going over and above the PEFC International benchmark requirements, that would minimise the risk of such activities taking place on PEFC certified forest area. Those measures should be addressed in both, the development of the scheme's documentation, rules and guidance but also in implementation of the scheme, including awareness, promotional and training activities.

Those measures and activities should focus on, but not limited to, the following issues:

- a) **Corruption:** Corruption at all levels is the common denominator for most reported cases of illegal activities in Ukraine and the sole reference to legal anti-corruption requirements in the forest management standard (UA SFM ST 02) is not sufficient. The scheme should define within the forest management standard specific requirements and measures relating to corruption and culture of compliance to be implemented within the forest management units. Those should cover organisation's anti-corruption and compliance policy adopted by senior management, code of conducts and/or compliance procedures, protection of whistle-blowers within the organisation and outside, communication on corruption issue within the organisation, training of staff at all levels, internal auditing, etc.
- b) **Precautionary approach:** The scheme owner (NVFCS) should take pre-cautionary approach towards the legality. It should, together with its stakeholders, identify and analyse the pre-dominant illegal activities in the forestry sector, especially those where different or conflicting interpretations of the legislation in force exist. The sanitary fellings or amber harvesting are examples of such issues.
- c) **Effective scheme requirements and guidance:** For the issues identified under bullet point b, the scheme owner (NVFCS) should develop either effective requirements within the forest management standard or guidance to be applied by certified forest managers and certification bodies.
- d) **Awareness amongst the key players:** The scheme owner (NVFCS) should actively promote the legality requirements and guidance (bullet point b and c) within its communication towards certified entities, certification bodies, accreditation body(ies) and affected stakeholders.
- e) **Training:** The scheme owner (NVFCS) should actively promote the legality requirements and guidance (bullet point b) within auditors training and auditor's attestation mechanisms. The NVFCS should also consider training activities that would be focused on forest managers.

- f) **Adapted certification process and auditing:** The illegal and corrupted activities are difficult to be detected within regular audits. Therefore, the scheme owner (NVFCS) should strengthen the following activities as part of auditing and certification process:
- the role of stakeholders consultation (especially local communities and E-NGOs);
 - employees interviews;
 - collection and analysis of relevant information from media, public reports, etc.
 - remote sensing techniques.
- g) **Stakeholders engagement:** The scheme owner (NVFCS) should actively engage with stakeholders and actively encourage them to report any identified cases of illegal activities or signs of corruption.
- h) **Strengthening complaints and dispute settlement:** The scheme owner should actively use its complaints and dispute settlement procedures to engage itself in resolving the reported cases of corruption and illegal activities.

8.7.5 Scheme's response and Action Plan

Following the draft interim report and detailed discussion with the scheme's representatives, the NVFCS decided to develop and adopt an "Action plan to prevent the risk of illegal wood and corruption in forest sector of Ukraine" (see Annex I).

The Action Plan that has been formally approved by the NVFCS and published at the NVFCS website^[29] includes specific measures that cover the following areas:

Area	Implemented	Planned to be implemented
Engagement with state administration in combatting illegal logging and corruption and developing forest strategy;	●	●
Checklist for auditors with the list of pre-dominant illegal activities	● ¹³	
Training for all stakeholders		●
Strengthening stakeholders consultation and use of external sources of information as a part of the audit	● ¹⁴	
Amended programme for training of auditors and their attestation		●
Amendment to the complaints procedures with special reference to illegal activities and corruption	● ¹⁵	●
Cooperation with E-NGO "Deep Green of Ukraine"		●

The proposed actions well-structured and include for each measure desired outcomes, implementation deadline, measure description and responsibility.

¹³ UA SFM ST 05, 7.10d and Appendix 4

¹⁴ UA SFM ST 05, 9.2.2.1, 7.10d

¹⁵ UA SFM ST 04, 5.5

8.7.6 Assessor's conclusion

The corruption issue and illegal logging is a complex issue and no single tool such as forest certification will be able to resolve it completely. It is assumed that only cumulative effort of both governmental as well non-governmental organisations, producers as well as buyers of forest-based material will be able to initiate necessary changes in the society.

The proposed Action Plan has potential to mitigate the risk that the activities associated with illegal logging and corruption are prevented on certified forest land and/or detected by certification audits.

The assessor recommends to the PEFC Council Board of Directors to acknowledge the Action Plan and to request the Assessor to evaluate progress on its implementation as a part of the in-country visit that is scheduled for no later than 18 months from the scheme's endorsement.

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>The statutes of the Association NVFCS adopted on 9 September 2019 confirms that the Association NVFCS is a legal entity with predefined organisational structure.</p> <p>UA SFM ST 01, 6.4 defines the role of the Working Group to develop and build consensus on the SFM standard (6.7).</p> <p>UA SFM ST 01, 7.1.4 defines that the General Meeting of the Association is responsible for formal approval of the SFM standard.</p> <p>Compliance: Conformity</p> <p>Justification: The document clearly identifies NVFCS as the standard setting body; the Working Group is the consensus building body and the General Meeting of the NVFCS is a body responsible for formal approval of the standard.</p>
(b) procedures for keeping documented information,	Procedures	YES	<p>UA SFM ST 01, 5.2 defines requirements for documented information to be kept by the Association NVFCS, including the list of retained documentation, duration of its storage and public availability.</p> <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>UA SFM ST 01, 6.4 defines the role of the Working Group with a simple requirement that members are accepted with the objective of balanced stakeholders' representation (6.4.3). The balanced representation is then defined in UA SFM TD 03, chapter 3 that defines structure of the Working Group consisting of six (6) stakeholder groups with balanced number of votes. shall stakeholders shall be</p> <p>Compliance: Conformity</p> <p>Justification: The document includes procedures for keeping documented information.</p>
(d) the standard-setting process,	Procedures	YES	<p>UA SFM ST 01, chapter 6 defines the standard setting process.</p> <p>Compliance: Conformity</p> <p>Justification: The document includes procedures for keeping documented information.</p>
(e) the mechanism for reaching consensus, and	Procedures	YES	<p>UA SFM ST 01, chapter 6.7 and UA SFM TD 03 define the decision making of the Working Group and consensus building.</p> <p>Compliance: Conformity</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			Justification: The document includes procedures for keeping documented information.
(f) review and revision of standard(s)/normative document(s).	Procedures	YES	<p>UA SFM ST 01, chapter 8 defines procedures for review of the SFM standard and chapter 9 for revision of the standard.</p> <p>Compliance: Conformity</p> <p>Justification: The document includes procedures for keeping documented information.</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>UA SFM ST 01, chapter 5.1.2 requires that the document is publicly available and updated regularly based on stakeholder's feedback.</p> <p>Compliance: Conformity</p> <p>Justification: UA SFM ST 01 requires public availability of the standard setting procedures and their review.</p>
	Process	YES	<p>UA SFM ST 01 together with the whole system documentation is publicly available at the official website of the Association: http://woodcertification.com.ua/en/Documentation-System/.</p> <p>Compliance: Conformity</p> <p>Justification: UA SFM ST 01 is publicly available.</p> <p>The review of UA SFM ST 01 is not applicable as the PEFC assessment considers initial development of the SFM standard.</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	<p>UA SFM ST 01, UA SFM TD 03 are the key standard setting documents.</p> <p>Compliance: Conformity</p> <p>Justification: The scheme keeps standard setting procedures.</p>
	Process	YES	<p>UA SFM ST 01 together with the whole system documentation is publicly available at the official website of the Association: http://woodcertification.com.ua/en/Documentation-System/.</p> <p>Compliance: Conformity</p> <p>Justification: The scheme keeps standard setting procedures and makes it publicly available through its website.</p>
(b) Stakeholder identification mapping,	Procedures	YES	<p>UA SFM ST 01, chapter 5.2.1a requires to keep a list of stakeholders.</p> <p>Compliance: Conformity</p> <p>Justification: The expression "list of stakeholders" satisfies the purpose of the stakeholders mapping as it represents the output of the stakeholders mapping exercise.</p>

PEFC benchmark requirement	Assessment basis	YES/NO	Reference to system documentation (including quotation of relevant text)
	Process	YES	<p>UA SFM TD 06 provides outputs of the stakeholders mapping.</p> <p>Compliance: Conformity</p> <p>Justification: UA SFM TD 06 provides a “list of stakeholders”. The document is available at the NVFCS website.</p>
(c) Contacted and/or invited stakeholders	Procedures	YES	<p>UA SFM ST 01, chapter 5.2.1d requires to keep evidence of the notice of the start of development of the standard.</p> <p>UA SFM GD 02, chapter 5.4.1 requires that “NVFCS should keep a contact database of invitees, their preferred method of communication and their responses. NVFCS should be aware of cultural differences and customs when inviting people”.</p> <p>UA SFM GD 03, chapter 5.5.4 requires a report of engagement NVFCS shall publicly report on their stakeholder engagement.</p> <p>Compliance: Conformity</p> <p>Justification: UA SFM GD 02 includes comprehensive requirements for stakeholders’ engagement including records on stakeholders invitation and outputs of engagement activities.</p>
	Process	YES	<p>The development report states that 91 stakeholders identified in the beginning of the process (December 2019) were invited to participate in the Working Group. The list of the 91 stakeholders is included in Appendix 4 to the Development Report (Proposal for Forest Management Standard Development).</p> <p>NVFCS also provided as a part of the assessment a list of e-mail invitations set to stakeholders^[26].</p>
(d) Stakeholders involved in standard-setting activities including participants in each working group meeting,	Procedures	YES	<p>UA SFM GD 02, chapter 5.4.1 requires to keep a list of invitees to the standard-setting process and chapter 5.5.4 requires a comprehensive report on stakeholders’ engagement.</p> <p>UA SFM ST 01, chapter 5.2.1c requires to keep minutes of meetings of the working group for the development of the standard.</p> <p>UA SD TD 03, chapter 2.16 requires the WG to keep records of its activities, minutes of the WG, etc.</p> <p>UA SFM ST 01, chapter 6.5.8 requires to provide responses to each stakeholder who submitted comments.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The quoted documentation requires to keep records on invited stakeholders.</p> <p>The quoted documentation does not include an explicit requirement on records of participation in each of the Working Group meetings. However, it is accepted that minutes of meetings include a list of persons present at the meeting.</p> <p>Concerning the stakeholders involved in public consultation, the Association is required to respond to each stakeholder and for that purpose it is expected that the Association keeps records of all stakeholders that submitted their comments.</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
	Process	YES	<p>Appendix 4 to the Development report includes a list of stakeholders that have been invited to the standard setting process.</p> <p>Appendix 5, 6, 7, and 9 include minutes of the Working Group meetings including a list of participants.</p> <p>The records relating to the public consultation allow identification of stakeholders that submitted their comments.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The quoted documentation provides records on stakeholders that have been involved in the standard setting process.</p> <p>Observation: The applicant has developed a comprehensive guidance on the stakeholders' engagement that exceeds the PEFC Council's requirements, especially in planning and reporting on the stakeholders' engagement. It should be noted that the scope of the document exceeds a time horizon of the standard setting process and also covers time period in between the periodic reviews/revisions. Therefore, not all procedures of the document are applicable to the standard-setting, haven't been implemented as a part of the standard setting and are over and above the scope of this assessment.</p>
(e) Feedback received and a synopsis of how feedback was addressed,	Procedures	YES	<p>UA SFM ST 01, chapter 5.2.1d requires to keep records on results of public consultation. Appendix B to UA SFM ST 01 then defines the format of the records (synopsis) on the public consultation, including the comment received and result of its consideration.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The quoted documentation specifies records and its structure relating to comments received and their consideration.</p>
	Process	YES	<p>Appendix 8 to the Development report provides synopsis of comments and their consideration from the first round of the public consultation.</p> <p>Appendix 10 to the Development report provides synopsis of comments and their consideration from the second round of the public consultation.</p> <p>The applicant also submitted primary evidence on comments received from individual stakeholders^[1, 2].</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The applicant retained records on comments from public consultation and their consideration.</p>
(f) All drafts and final versions of the standard,	Procedures	YES	<p>UA SFM ST 01, chapter 5.2.1b requires to retain all "projects of the Forest Management Standard".</p> <p>UA SFM GD 03, chapter 2.16 requires that the Working Group "2.16 Keeps records of its activities, including all draft Forest Management Standard, minutes of WG FM meetings, the results</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>of public discussions and other documents, and keeps them until the next update of the Forest Management Standard”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The documentation requires to retain all versions of the forest management standard.</p> <p>Observation: The wording in UA SFM ST 01 “projects of the Forest Management Standard” is not clear. However, within the context of the document it is understood that the word refers to different draft versions of the forest management standard.</p>
	Process	YES	<p>As a part of the evaluation, NVFCS provided several evidences that confirmed that different versions of the forest management standard have been kept. The versions have been provided to members of the WG.</p>
(g) Outcomes from working group considerations,	Procedures	YES	<p>UA SFM ST 01, chapter 5.2.1c requires to retain “minutes of meetings of the working group for the development of the standard”;</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>UA SFM ST 01 does not explicitly require to keep records of “outcomes from working group” considerations. However, it requires to keep minutes of the Working Group meetings and it is understood that the minutes should include the outcomes of the Working Group considerations.</p>
	Process	YES	<p>The minutes of the Working Group meetings (Appendix 5, 6, 7, 9 to the Development Report) have been kept and include outcomes of the Working Group meetings and their considerations. The minutes of the WG meeting are sufficiently detailed and also include main areas of the discussion and its results.</p> <p>Working Group's considerations of comments from public consultations are included in Synopsis of the Public Consultations (Appendix 8 and 10 of the Development Report).</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The applicant kept records on outcomes of considerations of the Working Group.</p>
(h) Evidence of consensus on the final version of the standard(s),	Procedures	YES	<p>UA SFM GD 03, chapter 4.8 requires that “Decisions of WG FM made at the meeting are recorded in the minutes. WG FM decisions are taken by consensus of members, with the exception of voting. WG FM observers and experts do not take part in the voting”.</p> <p>UA SFM GD 03, chapter 4.9 requires that “FM's decision on the recommendations for the final version of the draft standard for approval shall be made by consensus”.</p> <p>Compliance: Conformity</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			Justification: The procedures require to includes decision of the Working Group in the meeting minutes, including the decision on recommendation for the final draft to be formally approved.
	Process	YES	The association keeps the minutes of the Working Group meetings. Minutes of the last meeting (Appendix 12 to the Development Report) includes Working Group's decision to organise a postal ballot (by e-mails) on a final version of the standard. The association keeps records of e-mails of the Working Group members by which they approved the final version of the standard ^[3] .
(i) Evidence relating to the review process, and	Procedures	YES	UA SFM ST 01, chapter 5.2.1i requires to retain "evidence relating to the review process etc". Compliance: Conformity Justification: The procedures require to keep records on the review process.
	Process	NA	Not relevant. This is an initial development of the forest management standard.
(j) Final approval by the standardising body.	Procedures	YES	UA SFM ST 01, chapter 5.2.1h requires to retain "notification of approval of the standard". Compliance: Conformity Justification: The procedures require to keep records of standard's formal approval. It is assumed that the wording "notification" refers to "records".
	Process	YES	The association provided the minutes of the Association's General Meeting that formally approved the standard (Appendix 13 to the Development Report). Compliance: Conformity Justification: The Association keeps records of the final approval of the standard.
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	UA SFM ST 01, chapter 5.2.2: "Documented information shall be kept until completion of the next review or revision of the standard to which they refer. Otherwise the documented information must be kept for a minimum of five years after publication of the standard". Compliance: Conformity Justification: The procedures include identical requirement.

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
publication of the standard.	Process	YES	<p>The applicant keeps all the required records. See the PEFC requirement 5.2.1.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The applicant keeps the required records. However, at this stage it is not possible to evaluate whether the records will be kept until the next review/revision.</p>
5.2.3 Documented information shall be available to interested parties upon request.	Procedures	YES	<p>UA SFM ST 01, chapter 5.2.2: "UA SFM ST 01, chapter 5.2.2".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The procedures include identical requirement.</p>
	Process	YES	<p>The documented information was available to stakeholders.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The evidence provided by the applicant (see chapter 6) as well as interview with stakeholders confirm that stakeholders had access to the documented information kept by the applicant.</p> <p>Most of the retained documented information has also been published at the applicant's website or Facebook (see chapter 6).</p> <p>Questionnaires received from stakeholders do not indicate that stakeholders would be rejected the access to information.</p>
5.3.1 The standardising body shall establish procedure(s) for dealing with any substantial and process complaints and appeals relating to its standard-setting activities. It must make procedure(s) accessible to stakeholders. Upon receipt of a complaint or appeal, the standardising body shall:			
(a) acknowledge receipt of the complaint or appeal to the complainant,	Procedures	YES	<p>UA SFM ST 01, chapter 5.3.1: "The Association shall develop a procedure for dealing with complaints and appeals related to its standard-setting activities. It must make the procedure(s) accessible to stakeholders. Upon receipt of a complaint or appeal, the Association NVFCS shall:</p> <p>a) acknowledge receipt of the complaint or appeal to the applicant".</p> <p>UA SFM ST 04, chapter 1.1 (Scope): "This standard establishes the procedure for filing complaints and appeals by any natural person or organisation, their timely, independent and efficient investigation and preparation of the decision by the Complaint and Appeal Committee".</p> <p>UA SFM ST 04, chapter 5.3.1: "Upon receipt of the complaint, the Association NVFCS immediately informs the complainant of it and conducts preliminary registration of the complaint and its analysis to determine the need to start the complaint resolution process, taking into account:</p> <p>UA SFM ST 04, chapter 6.3.1.1: "6.3.1.1 Upon receipt of the appeal, the Association NVFCS immediately informs the appellant of it and conducts preliminary registration of the appeal and its</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>analysis to determine the need to start the appeal investigation process, taking into account...".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard setting procedures (UA SFM ST 01) defines general requirements for investigation of complaints and appeals relating to the standard setting and states that the association shall develop procedures for dealing with complaints and appeals.</p> <p>Detailed procedures are then included in UA SFM ST 04 and specific requirements for the work of the "Complaint and Appeal Committee" is then included in UA SFM GD 05.</p> <p>The quoted documents include a requirement that the receipt of the complaint / appeal shall be communicated to the complainant / appellant.</p>
	Process	YES	<p>The applicant has received no complaint relating to the standard setting activities.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The stakeholders interview as well as questionnaires received from stakeholders do not indicate that the applicant would receive any complaint relating to the standard setting activities.</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>UA SFM ST 01, chapter 5.3.1 b: "The Association shall develop a procedure for dealing with complaints and appeals related to its standard-setting activities. It must make the procedure(s) accessible to stakeholders. Upon receipt of a complaint or appeal, the Association NVFCS shall:</p> <p>b) gather and verify all necessary information to validate the impartially and objectively, and make a decision regarding the complaint or appeal".</p> <p>UA SFM ST 04, 5.3.1.3: "After registration of the complaint, the Head of the Association NVFCS appoints the chairman and members of the Complaint and Appeal Committee. While determining the number and composition of the members, the following shall be taken into account:</p> <p>a) type of complaint;</p> <p>b) subject matter of the complaint;</p> <p>c) defendant on the complaint;</p> <p>d) labor costs for complaint investigation;</p> <p>e) need to ensure the overall competence of the Committee members for effective and efficient investigation of the complaint;</p> <p>f) ensuring independence of the Committee members, lack of personal interest and conflict of interest."</p> <p>UA SFM ST 04, 5.3.2.2: "The Complaint and Appeal Committee shall undertake a thorough investigation of the complaint. If necessary, the Committee can request additional information from the complainant, defendant and third parties, as well as hold a joint meeting(s) or separate meetings with them".</p> <p>UA SFM ST 04, 6.3.1.4: "After registration of the appeal, the Head of the Association NVFCS appoints the chairman and members of the Complaint and Appeal Committee. While determining the</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>number and composition of the members, the following shall be taken into account:</p> <ul style="list-style-type: none"> a) type of appeal; b) subject matter of the appeal; c) labor costs for investigation of the appeal; d) need to ensure the overall competence of the members of the Committee for effective and efficient investigation of the appeal; e) ensuring the independence of the members of the Committee (they should not participate in the initial review and decision-making processes), lack of personal interest and conflict of interest". <p>UA SFM ST 04, 6.3.2.4: "The Complaint and Appeal Committee shall conduct a thorough analysis of the primary investigation and decision-making processes. During investigation, the Committee may request additional information from the appellant, defendant and third parties, as well as hold a joint meeting(s) or separate meetings with them".</p> <p>Additional detailed requirements for the composition and work of the Complaint and appeal committee are included in UA SFM GD 05.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard setting procedures (UA SFM ST 01) defines general requirements for investigation of complaints and appeals relating to the standard setting and states that the association shall develop procedures for dealing with complaints and appeals.</p> <p>Detailed procedures are then included in UA SFM ST 04 and specific requirements for the work of the "Complaint and Appeal Committee" is then included in UA SFM GD 05.</p> <p>The quoted documents include detailed requirements for investigation of complaints/appeals by Complaint and appeal committee, its structure and work.</p>
	Process	YES	<p>The applicant has received no complaint relating to the standard setting activities.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The stakeholders interview as well as questionnaires received from stakeholders do not indicate that the applicant would receive any complaint relating to the standard setting activities.</p>
(c) formally communicate the decision on the complaint or appeal to the complainant and describe the handling process.	Procedures	YES	<p>UA SFM ST 01, 5.3.1: "The Association shall develop a procedure for dealing with complaints and appeals related to its standard-setting activities. It must make the procedure(s) accessible to stakeholders. Upon receipt of a complaint or appeal, the Association NVFCS shall:</p> <ul style="list-style-type: none"> c) formally communicate the decision on the complaint or appeal to the complainant and describe the handling process". <p>UA SFMST 04, 5.4.1: "The complainant and other participants in the process shall be promptly notified in writing of the outcome of the complaint investigation".</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>UA SFMST 04, 6.4.1: "The appellant and other participants in the process shall be promptly notified in writing of the outcome of the appeal investigation".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard setting procedures (UA SFM ST 01) defines general requirements for investigation of complaints and appeals relating to the standard setting and states that the association shall develop procedures for dealing with complaints and appeals.</p> <p>Detailed procedures are then included in UA SFM ST 04.</p> <p>The quoted documents include detailed requirements for communicating the outcomes of the investigation of complaints/appeals to the complainant/appellant.</p>
	Process	YES	<p>The applicant has received no complaint relating to the standard setting activities.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The stakeholders interview as well as questionnaires received from stakeholders do not indicate that the applicant would receive any complaint relating to the standard setting activities.</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>UA SFM ST 01, 5.3.2: "The procedure for filing and reviewing complaints and appeals is set out in detail in the Complaints and Appeals Procedure".</p> <p>UA SFM ST 04, 5.2.2: "All type 1 and 2 complaints shall be submitted to the Head of the Association NVFCS by email or by regular mail, contact details may be found on the official website of the Association NVFCS (http://woodcertification.com.ua/), by email or by regular mail".</p> <p>UA SFM ST 04, 6.2.2: All type 1 and 2 appeals shall be submitted to the Head of the Association NVFCS by email or by regular mail contact details may be found on the official website of the Association NVFCS (http://woodcertification.com.ua/)</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard setting procedures (UA SFM ST 01) defines general requirements for investigation of complaints and appeals relating to the standard setting and states that the association shall develop procedures for dealing with complaints and appeals.</p> <p>Detailed procedures are then included in UA SFM ST 04.</p> <p>UA SFM ST 04 defines where and how a complaint / appeal can be submitted.</p>
	Process	YES	<p>The scheme documentation is available from the applicant website and is easily accessible to stakeholders.</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	YES	<p>UA SFM ST 01, 6.1.1: "For the creation of a new standard, the Association NVFCS shall develop a proposal including:</p> <p>a) the scope of the standard".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The procedures meet the requirement as it includes an identical text.</p>
	Process	YES	<p>Compliance: Conformity</p> <p>Justification:</p> <p>The applicant developed in December 2019 a "Proposal for Forest Management Standard Development" (Appendix 4 to the Development Report) that clearly defines scope of standard setting activities, a SFM standard for Ukraine for certification purposes.</p>
(b) a justification of the need for the standard,	Procedures	YES	<p>UA SFM ST 01, 6.1.1: "For the creation of a new standard, the Association NVFCS shall develop a proposal including:</p> <p>b) justification of the need for a standard...".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The procedures meet the requirement as it includes an identical text.</p>
	Process	YES	<p>Compliance: Conformity</p> <p>Justification:</p> <p>The applicant developed in December 2019 a "Proposal for Forest Management Standard Development" (Appendix 4 to the Development Report) that defines the objective and justifies the needs of standard setting activities.</p>
(c) a clear description of the intended outcomes	Procedures	YES	<p>UA SFM ST 01, 6.1.1: "For the creation of a new standard, the Association NVFCS shall develop a proposal including:</p> <p>c) a clear description of the expected results...".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The procedures meet the requirement as it includes an identical text.</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
	Process	YES	Compliance: Conformity Justification: The applicant developed in December 2019 a "Proposal for Forest Management Standard Development" (Appendix 4 to the Development Report) that defines the outcomes of the setting activities.
(d) a risk assessment of potential negative impacts arising from implementing the standard, such as <ul style="list-style-type: none"> • factors that could affect the achievement of the outcomes negatively, • unintended consequences of implementation, • actions to address the identified risks, and 	Procedures	YES	UA SFM ST 01, 6.1.1: "For the creation of a new standard, the Association NVFCS shall develop a proposal including: d) a risk assessment unintended consequences of implementation, actions to address the identified risks". Compliance: Conformity Justification: The procedures meet the requirement as it includes an identical text.
	Process	YES	Compliance: Conformity Justification: The applicant developed in December 2019 a "Proposal for Forest Management Standard Development" (Appendix 4 to the Development Report). The document states that the no negative impacts have been identified in the risk assessment.
(e) a description of the stages of standard development and their expected timetable.	Procedures	YES	UA SFM ST 01, 6.1.1: "For the creation of a new standard, the Association NVFCS shall develop a proposal including: e) a description of the stages of standard development and their expected timetable...". Compliance: Conformity Justification: The procedures meet the requirement as it includes an identical text.
	Process	YES	Compliance: Conformity Justification: The applicant developed in December 2019 a "Proposal for Forest Management Standard Development" (Appendix 4 to the Development Report). The document defines both the stages of the process as well as expected timetable (from December 2019 to January 2021).
6.1.2 For the revision of a standard the proposal shall cover at least (a) and (e) of clause 6.1.1.	Procedures	YES	UA SFM ST 01, 6.1.2: "For the revision of a standard the proposal shall cover at least (a) and (e) of clause 6.1.1". Compliance: Conformity Justification: The procedures meet the requirement as it includes an identical text.

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
	Process	N/A	Not relevant as the assessment only covers the initial development of the standard.
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 Association shall identify the likely key issues, key stakeholders, and which means of communication would be best to reach them.	Procedures	YES	<p>UA SFM ST 01, 6.2.1: "The Association shall identify stakeholders that are relevant to the objectives of the standard 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 Association shall identify the likely key issues, key stakeholders, and which means of communication would be best to reach them."</p> <p>Additional detailed procedures for stakeholders' engagement are included in UA SFM GD 02.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The procedures meet the requirement as it includes an identical text.</p>
	Process	YES	<p>UA SFM TD 06 includes a list of stakeholders that are classified into six groups. Importance of each group and its level of interactions is then specified based on assessment of impact of the stakeholder group on NVFCS and impact of NVFCS on stakeholders. The level of interaction is classified in five categories from "High interaction" to "Very low interaction". All six groups are classified in two highest categories "High interaction" and "Moderate interaction".</p> <p>UA SFM GD 02 defines methodology and procedures for stakeholders' engagement. However, it also defined for each of the six groups the means of communication and key issues.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>UA SFM TD 06 can be considered as an output of stakeholder mapping. It is missing identification of means of communication as well as key issues.</p> <p>However, those elements are included in UA SFM GD 02.</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:	Procedures	YES	<p>UA SFM ST 01, 6.2.2: "Stakeholders should be identified for each of the groups:</p> <ul style="list-style-type: none"> - forest management bodies; - business and industry; - non-governmental organizations; - scientific and technical community; - workers and trade unions; - women and children". <p>Compliance: Conformity</p> <p>Justification:</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
<ul style="list-style-type: none"> • forest owners, • business and industry, • indigenous people, • non-government organisations, • scientific and technological community, • workers and trade unions. <p>Other groups shall be added if relevant to the scope of standard-setting activities.</p>			The Procedures include an identical text to the PEFC requirement.
	Process	YES	<p>UA SFM TD 06 includes a list of stakeholders that are classified into six groups.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The applicant identified 91 stakeholders that are assigned to 6 stakeholder groups as required by UA SFM ST 01. Those 6 groups are identical with the groups defined in PEFC ST 1001:2017.</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>UA SFM ST 01, 6.2.3: "The Association shall identify disadvantaged stakeholders and key stakeholders and address any constraints to their participation in standard-setting activities.</p> <p>Note: A stakeholder can be both a disadvantaged and a key stakeholder at the same time".</p> <p>UA SFM GD 02, 4.4: "NVFCS shall identify disadvantaged stakeholders and address any constraints to their participation in standard-setting activities".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Procedures include an identical text to the PEFC requirement.</p>
	Process	YES	<p>UA SFM TD 06 with a list of 91 stakeholders includes a level of "interaction" for 6 subgroups. However, it includes neither identification of key nor disadvantaged stakeholders.</p> <p>UA SFM GD 02 that is understood as "procedural document". The document (5.2.1) states that "NVFCS shall identify key subgroups of stakeholders in accordance with PEFC ST 1001:2017. Within evaluation of a level of impact of stakeholder subgroups on NVFCS, as well as NVFCS's impact on the relevant stakeholder subgroups, the key subgroups should be recognized as those with moderate and high level of engagement (Table 1)".</p> <p>UA SFM TD 06 then classifies all six (subgroups) as "moderate" or "high interaction" and states that considers all those stakeholders (subgroups) as key stakeholders".</p> <p>None of the stakeholders UA SFM TD 06 has been identified as a "disadvantaged" stakeholder.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The stakeholders mapping identified both key as well as disadvantaged stakeholders and defines communication means with the stakeholders to address any constraints of their participation.</p> <p>NVFCS provided stakeholders participating in the WG with travel compensations. As such no stakeholders would be disadvantaged</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>from the financial resources point of view. IN addition, a significant part of the process had been conducted through on-line teleconferences. No other issues such as language, travel time, accessibility to information, etc. have been found relevant to Ukrainian conditions.</p> <p>Observation:</p> <p>The applicant identified all stakeholders as “key” based on level of interaction assessed for individual subgroups. This would satisfy the letter of the PEFC requirement, however, lacks the purpose of the approach itself. The purpose of identification of “key stakeholders” is to recognise that different organisations have different importance in the standard-setting process and that level of engagement should reflect this fact. However, as the applicant made classification for stakeholders’ subgroups, all subgroups a naturally considered as “key” and thus all stakeholders are considered as key. The applicant’s approach then does not allow differentiating between stakeholders within the subgroups.</p>
<p>6.3.1 The standardising body shall make a public announcement of the start of the standard-setting process and include an invitation to stakeholders to participate in the process. The announcement shall be made in a timely manner through suitable media, as appropriate, to give stakeholders an opportunity for meaningful contributions.</p> <p>NOTE 1 <i>In a timely manner</i> means (at the latest) four weeks before the first standard-setting activity is scheduled to occur.</p> <p>NOTE 2 <i>Through suitable media</i> means at least through the standardising body’s website and by email and/or letter to identified stakeholders. Other media includes press releases, news articles, features in trade-press, information sent to branch organisations, social media, digital media, etc.</p>	Procedures	YES	<p>UA SFM ST 01, 6.3: “The Association shall make a public announcement of the start of the standard- setting process and include an invitation to stakeholders to participate in the process. The announcement shall be made in a timely manner through suitable media, as appropriate, to give stakeholders an opportunity for meaningful contributions...</p> <p>Note 1: In a timely manner means (at the latest) four weeks before the first standard- setting activity is scheduled to occur.</p> <p>Note 2: Through suitable media means at least through the Association website and by email and/or letter to identified stakeholders. Other media includes press releases, news articles, features in trade-press, information sent to branch organizations, social media, digital media, etc”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Procedures include an identical text to the PEFC requirement.</p>
	Process	YES	<p>On 15 December 2019, the applicant published a formal announcement of the standard setting process and invitation to stakeholders to participate in it^[4].</p> <p>On 18 December 2019, the public announcement was published at the website of the “Society of Foresters of Ukraine”^[5].</p> <p>On 16 December 2019, the applicant sent individual e-mails to all stakeholders (91) identified in the stakeholders mapping. The email included a link to the applicant’s website and a document with the public announcement.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The applicant made a public announcement through its website as well as through direct mailing (suitable media). The announcement was made four weeks prior to the first meeting of the Working Group (15.1.2020).</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
6.3.1 The announcement and invitation shall include:			
(a) overview of the standard-setting process,	Procedures	YES	<p>UA SFM ST 01, 6.3: "...The announcement and invitation shall include: a) overview of the standard-setting process;..."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Procedures include an identical text to the PEFC requirement.</p>
	Process	YES	<p>The public announcement at the applicant's website^[4] included description of the standard setting process. The announcement also included a link to the "Proposal for Forest Management Standard Development (Appendix 4 to the Development Report).</p> <p>The direct mailing^[5] included an attachment with key information on the process and its stages as well as a link to the applicant's website.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The public announcement, both published at the website as well as communicated by e-mail included overview of the process.</p>
(b) access to the proposal for the standard (refer to 6.1),	Procedures	YES	<p>UA SFM ST 01, 6.3: "...The announcement and invitation shall include: b) access to the proposal for the standard (clause 6.1);..."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Procedures include an identical text to the PEFC requirement.</p>
	Process	YES	<p>The public announcement at the applicant's website^[4] included a link to the "Proposal for Forest Management Standard Development (Appendix 4 to the Development Report).</p> <p>The direct mailing^[5] included a link to the applicant's website.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The public announcement, both published at the website as well as communicated by direct mailing provided an access to 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>UA SFM ST 01, 6.3: "...The announcement and invitation shall include: c) information on the possibility of stakeholder participation in the process;..."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Procedures include an identical text to the PEFC requirement.</p>
	Process	YES	<p>The public announcement at the applicant's website^[4] included information that stakeholders can either participate through the Working Group or commenting on a draft standard (public consultation).</p> <p>The direct mailing^[5] included a link to the applicant's website.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The public announcement, both published at the website as well as well as communicated by direct mailing provided information on opportunities to participate in the process.</p>
(d) requests to stakeholders to nominate their representative(s) or themselves to the working group (refer to 6.4). The request to disadvantaged stakeholders and key stakeholders shall be made in a manner that ensures that the information reaches intended recipients and in a format that is easy to understand,	Procedures	YES	<p>UA SFM ST 01, 6.3: "...The announcement and invitation shall include: 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,..."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Procedures include an identical text to the PEFC requirement.</p>
	Process	YES	<p>The public announcement at the applicant's website^[4] included an explicit invitation to stakeholders to nominate a member of the Working Group.</p> <p>The direct mailing^[5] was sent to all identified stakeholders and included a link to the applicant's website as well as attached file with the invitation to stakeholders.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The public announcement, both published at the website as well as well as communicated by direct mailing provided invitation to stakeholder to nominate a member of the Working Group.</p> <p>The invitation was sent by direct emails to all identified stakeholders. The email communication and attached file with invitation ensured that the information reached the recipient and was easy to understand.</p>
(e) explicit invitation and clear instruction on how to submit feedback on the scope and	Procedures	YES	<p>UA SFM ST 01, 6.3: "...The announcement and invitation shall include: e) explicit invitation and clear instruction on how to submit feedback on the scope and standard-setting process, and,..."</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
standard-setting process, and			Compliance: Conformity Justification: The Procedures include an identical text to the PEFC requirement.
	Process	NO	<p>The public announcement at the applicant's website^[4] and direct mailing^[4] included description of the scope as well as process of the standard setting in the main of body of the announcement as well as in an attached file.</p> <p>However, the announcement did not include an explicit invitation to stakeholders to comment on the proposed scope and standard-setting activities.</p> Compliance: Minor non-conformity Justification: The announcement did not include an explicit invitation to stakeholders to comment on the proposed scope and standard-setting activities. <p>However, it should be noted that a number of organisations active in forestry sector of Ukraine have been consulted prior to the formal start of the standard setting process. This included the national standardisation body, Society of Foresters of Ukraine, State Agency of Forest Resources of Ukraine, business representatives. Their views have been considered when designing the standard setting process itself.</p> <p>In addition, as a part of the reminder of the 1st public consultation on the enquiry draft of the forest management standard (24 March 2020)^[27], the NVFCS also invited stakeholders to comment on the standard setting process. The NVFCS has received no comment relating to the standard setting process. It can be assumed that if the NVFCS have had received a comment, it could have still had possibility to respond to the comment by amending the later stages of the standard setting process.</p>
(f) access to the standard-setting procedures.	Procedures	YES	UA SFM ST 01, 6.3: "...The announcement and invitation shall include: f) access to the standard development procedure..." Compliance: Conformity Justification: The Procedures include an identical text to the PEFC requirement.
	Process	YES	<p>The public announcement at the applicant's website^[4] included a link to the standard setting procedures.</p> <p>The direct mailing^[5] included a link to the applicant's website.</p> Compliance: Conformity Justification: The public announcement, both published at the website as well as well as communicated by direct mailing provided access to standard setting procedures.

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
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>UA SFM ST 01, 6.3.2: “The Association shall review the standard-setting process based on feedback received in response to the public announcement...”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Procedures include an identical text to the PEFC requirement.</p>
	Process	YES	<p>The Development Report does not include information on consideration of comments received in response to the public announcement.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The NVFCS claims that stakeholders have not submitted comments relating to the design of the standard setting process. This was verified during stakeholders interview.</p> <p>It should be noted that minor non-conformity has been assigned for requirement 6.3.1e that requires the standardization body to invite stakeholders to submit comments on the proposed standard setting process as the invitation was made during the public consultation rather than at the time of the announcement of the start of the standard setting process.</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>UA SFM ST 01, 6.4.1: “The Association shall establish a permanent or temporary working group to develop a standard or adjust the composition of an existing working group based on the received candidate...”</p> <p>UA SFM ST 01, 6.4.3: “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 organization, an individual's competence, an individual's relevant experience and resources available for standard-setting”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Procedures include an identical text to the PEFC requirement.</p>
	Process	YES	<p>Following the invitation to nominate members of the Working Group, the applicant had received 10 nominations for membership in the Working Group (for 12 seats). The NVFCS accepted all received nominations.</p> <p>The stakeholders interview revealed that the NVFCS Chairwomen played an important role in contacting stakeholders and motivating them in joining the Working Group.</p> <p>In order to build a gender balance, two women representing NVFCS (the applicant) were appointed members of the Working Group.</p> <p>Compliance</p> <p>Justification:</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			All received nominations were accepted.
6.4.2 The working group shall:			
(a) have balanced representation and decision-making by stakeholder categories, relevant to the subject matter and geographical scope of the standard, where no single concerned stakeholder group can dominate, nor be dominated in the process, and	Procedures	YES	<p>UA SFM TD 03, chapter 3.1 defines that the Working Group consist of six groups (Group 1: Forest management bodies, Group 2: Business and industry, Group 3: Non-governmental organizations, Group 4: Scientific and technological community, Group 5: Workers and trade unions, Group 6: Women and children).</p> <p>UA SFM TD 03, chapter 3.2 defines that each of the six groups can consist of one or two voting members.</p> <p>UA SFM TD, 03, chapter 3.5: "When determining the quantitative and personal composition of WG FM, a balance of interests is ensured by groups (see clause 3.1 of this provision), by the gender balance of men and women, by geographical representation, and the following qualification requirements..."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Procedures define balance of stakeholder categories as well as refer to geographical representation and gender balance.</p>
	Process	YES	<p>The Working Group consisted of 12 members with 2 members representing each of the six predefined stakeholder groups. The Working Group has balanced gender representation (7 male, 5 women) and covers the whole territory of Ukraine.</p> <p>The membership of the Working Group is shown in Annex E.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Working Group membership follows the balanced representation defines by UA SFM TD 03.</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>UA SFM TD 03, chapter 3.1 defines that the Working Group consist of six groups (Group 1: Forest management bodies, Group 2: Business and industry, Group 3: Non-governmental organizations, Group 4: Scientific and technological community, Group 5: Workers and trade unions, Group 6: Women and children).</p> <p>UA SFM TD 03, chapter 3.2 defines that each of the six groups can consist of one or two voting members.</p> <p>UA SFM TD, 03, chapter 3.5: "When determining the quantitative and personal composition of WG FM, a balance of interests is ensured by groups (see clause 3.1 of this provision), by the gender balance of men and women, by geographical representation, and the following qualification requirements are taken into account:</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>a) knowledge and / or experience in the field of forest management in the geographical region to which the Forest Management Standard. will apply;</p> <p>b) knowledge and experience in the field of PEFC documents;</p> <p>c) understanding the potential impact of the Forest Management Standard on the affected stakeholders;...”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Procedures defines qualification relating to the SFM knowledge and expertise that shall be taken into account when appointing the Working Group members (3.5).</p> <p>Two Groups out of six within the Working Group (33 %) represent stakeholders that are affected by the standard (Group 1: Forest management bodies, Group 5: Workers and trade unions). Also, forest industry and women can be considered as affected by the implementation of the standard.</p>
	Process	YES	<p>All appointed members of the Working Group have vast knowledge and experience in the forestry sector and are well positioned within the sector to represent relevant stakeholder groups (See the Development Report for members of the Working Group). The Working Group also includes two (respectively three) members representing a scientific community. In addition, the Working Group was also supported by consultants.</p> <p>2 members represent forest management bodies (Group 1) and 2 members forest workers and trade unions.</p> <p>The stakeholders interview revealed that the members of the Working Group represent persons with high reputation within the forestry and environmental sector of Ukraine.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Working Group includes members with vast experiences and knowledge in SFM and forestry sector. Affected stakeholders represent an appropriate proportion of the Working Group.</p>
6.4.3 In order to achieve balanced representation, the standardising body shall strive to have all identified stakeholder groups (refer to 6.2) represented. The standardising body shall set targets for the participation of key stakeholders and proactively seek their participation by using outreach such as (but not limited to) personal	Procedures	YES	<p>UA SFM TD 03, chapter 3.1 defines that the Working Group consist of six groups (Group 1: Forest management bodies, Group 2: Business and industry, Group 3: Non-governmental organizations, Group 4: Scientific and technological community, Group 5: Workers and trade unions, Group 6: Women and children).</p> <p>UA SFM TD 03, chapter 3.2 defines that each of the six groups can consist of one or two voting members.</p> <p>UA SFM TD, 03, chapter 3.5: “When determining the quantitative and personal composition of WG FM, a balance of interests is ensured by groups (see clause 3.1 of this provision), by the gender balance of men and women, by geographical representation, and the following qualification requirements are taken into account...”</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
<p>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>UA SFM ST 01, 6.3.1 requires direct invitation of all identified stakeholders.</p> <p>UA SFM GD 02 includes requirements for stakeholders engagement, including the main communication channels.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The procedures define a target of balanced representation by having 1 to 2 members per each stakeholder group within the Working Group. It requires personal invitation to be sent to all identified stakeholders to nominate members of the Working Group.</p>
	Process	YES	<p>The Working Group has 12 members, 2 per each stakeholder groups. The Development Report indicates that a phone call to the state forest agency was used to receive additional nominations and building a balanced participation in the Group.</p> <p>The stakeholders interview also revealed that the NVFCS Chairwoman played an important role in communication with stakeholders and her personal approach was crucial in bringing stakeholders to the Working Group.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Working Group includes representation for all envisaged stakeholder groups.</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>UA SFM ST 01, 6.4.4: Activities of the working group shall be based on the principles of openness and transparency, therefore: a) working drafts of the standard shall be available to all members of the working group."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Procedures include an identical text to the PEFC requirement.</p>
	Process	YES	<p>The Secretariat of the NVFCS distributed invitations to the meetings by e-mails^[6]. The invitation e-mails included an agenda for the meetings as well as the latest drafts of the forest management standard.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>Prior to meetings, the members of the Working Group received a written invitation (e-mail) to the meetings with an agenda and latest drafts of the standard.</p>
(b) all members of the working group shall be	Procedures	YES	<p>UA SFM ST 01, 6.4.4: Activities of the working group shall be based on the principles of openness and transparency, therefore: b) all members of the working group shall be given real</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
given meaningful opportunities to contribute to the development or revision of the standard and to provide feedback on working drafts, and			<p>opportunities to contribute to the development or revision of the standard, as well as to provide feedback on working drafts.”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Procedures include an identical text to the PEFC requirement.</p>
	Process	YES	<p>Based on review of the minutes of the Working Group meetings (Appendices 5, 6, 7, 9 and 12 of the Development Report), the following conclusions are made:</p> <ul style="list-style-type: none"> - The Working Group met 5 times during the period between January 2020 and June 2020. Two of the meetings were organised as two-days meetings. - The meetings were well organised with clearly written and communicated agenda for each meeting. - The meetings were well attended by members of the working group (full participation or 11 out of 12 members) as well as a number of experts, consultants and observers. - Due to COVID travel restrictions, 3 meetings were held as online meetings. They were recorded in formal minutes but also streamed and published at the PEFC Ukraine's Youtube channel. - Consultants and experts were used to draft the standard, and integrate results of discussion and outcomes of the Working Group meetings. - The meetings provided sufficient time for discussion. <p>The stakeholders interviews that covered vast majority of the Working Group members from all stakeholder subgroups revealed that members of the Working Group were highly satisfied with the organisation of the meeting, openness of the meetings, discussion and positive approach of all participants.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Working Group meetings were well organized and provided members with opportunities for meaningful contributions. The Working Group was supported by numerous consultants and experts that were responsible for preparing draft documents based on outcomes of the meetings.</p> <p>Observation:</p> <p>The standard was developed and discussed within very short time (from 15/01/2020 until 10/6/2020) with some meetings organized in very short time period in between them. In addition, during this 5-month period, two public consultations were run and a pilot testing took place.</p> <p>Therefore, the time availability could potentially have a negative impact on robustness of the process, discussion and negotiation between stakeholders.</p> <p>The topics was intensively discussed with the NVFCS representatives as well as members of the Working Group. They</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>all agreed that the time for the standard setting was sufficient taking into account the following facts:</p> <ul style="list-style-type: none"> e) The debate on the draft standards started between some stakeholders already in 2019, well before the formal start of the process; f) The first draft of the standard was developed well prior to the start of the process by experts; g) The whole process was supported by experts and consultants that were working in between the meetings to provide the Working Group with options and solutions; h) The COVID restrictions allowed the Working Group members to have more time for the standard setting and online meetings.
(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>UA SFM ST 01, 6.4.4: Activities of the working group shall be based on the principles of openness and transparency, therefore: 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."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Procedures include an identical text to the PEFC requirement.</p>
	Process	YES	<p>The minutes of the Working Group meetings (Appendices 5, 6, 7, 9 and 12 of the Development Report) provide evidence of the openness and consideration of comments raised by the Working Group members.</p> <p>The minutes of the meetings have been kept and distributed to the Working Group members^[6].</p> <p>Information about the meetings were also published at the applicant's website and Facebook^[8].</p> <p>Recordings of the Working Group meetings were published at Youtube^[7] and information about the meetings and their outputs were also communicated through websites https://www.openforest.org.ua, https://tlu.kiev.ua/, and https://derevoobrobnyk.com (see the Development Report for specific links).</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Working Group meetings were well organized, their results were recorded and communicated not only to the members of the Working Group but also publicly through websites, Facebook and Youtube.</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,	Procedures	YES	<p>UA SFM ST 01, 6.7.3: "6.7.2 The decision of the working group to recommend the final version of the draft standard for approval shall be taken by consensus.</p> <p>Notes:</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
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.,			<p>1 Consensus is a general agreement characterized by the absence of ongoing opposition on important issues by a significant number of stakeholders and the process of finding opportunities to take into account the views of all stakeholders and reconcile conflicting arguments.</p> <p>2 Consensus does not mean unity".</p> <p>UA SFM ST 01, 6.7.3: "If there are discrepancies, the working group can use the following methods to resolve them: a) a face-to-face meeting, where an open vote for/against will be held and a statement of consensus will be made by the head of the working group in the absence of disagreements or a vote (votes) against;"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Procedures require the consensus and a voting to at face-to-face meetings to find out whether there is opposition.</p>
	Process	N/A	<p>Compliance: Not applicable</p> <p>Justification:</p> <p>The Working Group decision was made through e-mail correspondence (see 6.4.5c).</p>
(b) telephone conference meeting(s) where there is a verbal yes/no vote,	Procedures	YES	<p>UA SFM ST 01, 6.7.3: "If there are discrepancies, the working group can use the following methods to resolve them: b) telephone conference meeting, where an open vote "for / against" will be held;"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Procedures require the consensus and a voting to at a telephone conference to find out whether there is opposition.</p>
	Process	N/A	<p>Compliance: Not applicable</p> <p>Justification:</p> <p>The Working Group decision was made through e-mail correspondence (see 6.4.5c).</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>UA SFM ST 01, 6.7.3: "If there are discrepancies, the working group can use the following methods to resolve them: c) request by e-mail to the members of the working group for consent or objection;..."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Procedures require the consensus and expression of consent of objection by e-mail correspondence.</p>
	Process	YES	<p>At its fifth meeting held on 9-10/6/2020, the Working Group decided to make final changes to the standard where members of the Working Group will be expressing their support to the standard by e-mail (Appendix 12 to the Development Report).</p>

PEFC benchmark requirement	Assess. basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			The applicant received a positive vote from all members of the Working Group ^[9] .
(d) combinations of these methods.	Procedures	YES	<p>UA SFM ST 01, 6.7.3: "If there are discrepancies, the working group can use the following methods to resolve them: d) a combination of these methods."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Procedures require the consensus and allow combinations of methods a-c.</p>
	Process	N/A	<p>Compliance: Not applicable</p> <p>Justification:</p> <p>The Working Group decision was made through e-mail correspondence (see 6.4.5c).</p>
6.4.6 Where a vote is used in decision-making, the standard-setting procedures shall determine and include decision-making thresholds that quantifies consensus. The threshold must be consistent with the consensus definition (refer to 3.1). However, a majority vote cannot override sustained opposition in order to achieve consensus.	Procedures	YES	<p>UA SFM ST 01, 6.7.4: "If voting is used in decision-making, the Association shall establish voting procedures and decision-making thresholds."</p> <p>UA SFM TD 03, 4.12: "If voting is used in decision-making, the percentage of votes («for» / «against» / «abstained») is not determined, and only negative votes are detected – «against». The chairman, if necessary, offers to motivate (justify) objections to the members of WG FM who have expressed objections. Unmotivated (unsubstantiated) objections are not accepted and are not considered. If a reasoned (substantiated) objection is accepted for consideration and satisfied without further discussion, the objecting WG FM member shall be notified and consensus shall be deemed reached. If there is a reasoned (substantiated) objection that cannot be accepted and satisfied (there are issues that require additional discussion), it is considered significant".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The general procedures (UA SFM ST 01) include an optional requirement for using a voting and threshold. However, specific procedures for the Working Group than specify that voting is only used to identify opposition to the standard that shall be then resolved by some of predefined methods.</p>
	Process	YES	The Working Group only used the voting to identify if there is opposition to the final draft standard ^[9] (Appendix 12 to the Development Report).
6.4.7 When there is sustained opposition to a substantial issue, the issue shall be resolved using the following methods:			
(a) finding a compromise through discussion and negotiation on the	Procedures	YES	UA SFM ST 01, 6.7.5: "When there is sustained opposition to a substantial issue, the issue shall be resolved using the following methods: a) finding a compromise by discussing and negotiating a contentious issue within the working group;..."

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
disputed issue within the working group,			<p>UA SFM TD 03, 4.13 "In the presence of constant opposition, the following methods can be used: a) finding a compromise by discussing and negotiating a controversial issue within the framework of the WG FM,...".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>Both the general procedures for standard setting as well as specific procedures for the Working Group specify discussion and negotiation within the Working Group as the first available option for resolving an opposition.</p>
	Process	N/A	The final draft standard was unanimously recommended for formal approval.
(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>UA SFM ST 01, 6.7.5: "When there is sustained opposition to a substantial issue, the issue shall be resolved using the following methods: b) finding a compromise through direct negotiations between the stakeholder (stakeholders) with different views on the issue,..."</p> <p>UA SFM TD 03, 4.13 "In the presence of constant opposition, the following methods can be used: b) finding a compromise through direct negotiations between the stakeholder (s) with different views on the disputed issue;...".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>Both the general procedures for standard setting as well as specific procedures for the Working Group specify discussion and negotiation between concerned stakeholders as the second available option for resolving an opposition.</p>
	Process	N/A	The final draft standard was unanimously recommended for formal approval.
(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>UA SFM ST 01, 6.7.5: "When there is sustained opposition to a substantial issue, the issue shall be resolved using the following methods: c) additional round(s) of public consultation (if necessary) where further stakeholder input can help to achieve consensus on unresolved issues. The Association determines the scope and duration of any additional public consultation...."</p> <p>UA SFM TD 03, 4.13 "In the presence of constant opposition, the following methods can be used: d) additional round (s) of public discussions (if necessary)".</p> <p>In addition to those options, UA SFM TD 03 also defines an option of appointing a negotiator and request for advice to the PEFC Council.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>Both the general procedures for standard setting as well as specific procedures for the Working Group specify an additional public consultation as an additional option for resolving an opposition.</p>

PEFC benchmark requirement	Assessment basis	YES/NO	Reference to system documentation (including quotation of relevant text)
	Process	N/A	The final draft standard was unanimously recommended for formal approval.
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>UA SFM ST 01, 6.7.5: "When a substantial issue cannot be resolved and sustained opposition persists, the Association shall initiate a resolution of the dispute and ask for advice from the PEFC Council on further action, with the possibility of extending the deadline set for completion, but no more than one year."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Procedures require to proceed any unresolved sustained opposition using the dispute procedures. Although not explicit, it is assumed that when the Procedures refer to the "dispute", the Association's dispute procedures will be applied.</p>
	Process	N/A	The final draft standard was unanimously recommended for formal approval.
6.5.1 The standardising body shall organise public consultation on the enquiry draft and shall ensure that:			
(a) the start and the end dates of public consultation are announced in a timely manner through suitable media, <i>NOTE In a timely manner means (at the latest) the day before the start of public consultation.</i>	Procedures	YES	<p>UA SFM ST 01, 6.5.1: "The Association shall organize a public consultation of the enquiry draft standard lasting at least 60 days".</p> <p>UA SFM ST 01, 6.5.2: "At the latest one day before the start of public consultation the Association NVFCS shall:</p> <p>a) publish announcement about the start of public consultation on the official website, where shall be announced the start and the end dates of public consultation...</p> <p>Note 1: Invitations shall be sent to disadvantaged and key stakeholders by methods that ensure they reach recipients and are easy to understand,</p> <p>Note 2: Enquire draft should be publicly available and shall be provided to any stakeholder on inquire."</p> <p>UA SFM ST 01, 6.5.3: "The stakeholders shall consider the enquiry draft of the standard, prepare written responses to the first edition of the draft standard and send them by e-mail no later than 60 calendar days from the date of posting".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Procedures require to a public announcement that is published in a timely manner (at least one day prior to the start) and includes both the start and the end dates of the consultation. organize a 60 days public consultation and to announce it one day before its official start. The Procedures defines that the announcement is made at the Association's website and is distributed to stakeholders.</p>
	Process	YES	The announcement at the applicant's website ^[10] includes both the start date of the public consultation (25/02/2020) as well as the end date of the public consultation. The announcement was

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>published on 24/02/2020, prior to the start of the public consultation.</p> <p>The announcement was also made at the applicant Facebook^[11] and a Facebook public group "Forest Lovers of Ukraine" ^[12].</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The announcement was published at the applicant's website included both the start and the end date of the public consultation and was published a day before its start.</p>
(b) a direct invitation to comment on the enquiry draft is sent to each stakeholder identified by stakeholder identification mapping (refer to 6.2) aiming for a balanced participation of stakeholder groups,	Procedures	YES	<p>UA SFM ST 01, 6.5.2: "UA SFM ST 01, 6.5.2: "At the latest one day before the start of public consultation the Association NVFCS shall...:</p> <p>c) control, that a direct invitation to comment on the enquiry draft is sent to each stakeholder identified by stakeholder identification mapping aiming for a balanced participation of stakeholder groups,..."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Procedures requires that the announcement is distributed to all stakeholders identified in the stakeholder mapping.</p>
	Process	YES	<p>On 24/02.2020, the announcement for the public consultation was distributed by E-mail^[13] to all stakeholders (91) that were identified in the stakeholders mapping (Appendix 4 to the Development Report, UA SFM TD 06).</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The announcement was distributed by e-mail to all identified stakeholders.</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>UA SFM ST 01, 6.5.2: "At the latest one day before the start of public consultation the Association NVFCS shall...:</p> <p>c) control, that a direct invitation to comment on the enquiry draft is sent to each stakeholder identified by stakeholder identification mapping aiming for a balanced participation of stakeholder groups,</p> <p>Note 1: Invitations shall be sent to disadvantaged and key stakeholders by methods that ensure they reach recipients and are easy to understand,</p> <p>Note 2: Enquire draft should be publicly available and shall be provided to any stakeholder on inquire."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Procedures requires that the announcement is distributed to all stakeholders. The Notes then specify detailed procedures for disadvantaged and key stakeholders.</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
	Process	Yes	<p>On 24/02.2020, the announcement for the public consultation was distributed by E-mail^[13] to all stakeholders (91) that were identified in the stakeholders mapping (Appendix 4 to the Development Report, UA SFM TD 06).</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The announcement was distributed by e-mail to all identified stakeholders. The e-mail correspondence with clear description of the public consultation, an explicit invitation, a link to the applicant's website and attached documents ensured that it had reached the recipient and was sufficiently clear to be easily understood.</p>
(d) the enquiry draft is made publicly available,	Procedures	YES	<p>UA SFM ST 01, 6.5.2: "At the latest one day before the start of public consultation the Association NVFCS shall...:</p> <p>b) publish on the official website the enquiry draft, which was finally approved by Working Group on the Standard Development,...</p> <p>Note 2: Enquire draft should be publicly available and shall be provided to any stakeholder on inquire."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Procedures requires that the enquiry draft is made publicly available and is published at the website.</p>
	Process	YES	<p>The public announcement of the public consultation at the applicant's website^[10] provided a link to the enquiry draft.</p> <p>E-mail correspondence to stakeholders^[13] included the enquiry draft attached to the e-mail and also provided a link to the applicant's website.</p> <p>The announcements made at Facebook^[11, 12] always included a link to the applicant's website where the enquiry draft was accessible.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The enquiry draft was publicly available.</p>
(e) public consultation is for at least 60 days,	Procedures	YES	<p>UA SFM ST 01, 6.5.1: "The Association shall organize a public consultation of the first edition of the draft standard lasting at least 60 days".</p> <p>UA SFM ST 01, 6.5.2: "At the latest one day before the start of public consultation the Association NVFCS shall: a) publish announcement about the start of public consultation on the official website, where shall be announced the start and the end dates of public consultation..."</p> <p>Compliance: Conformity</p> <p>Justification:</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			The Procedures require to organize a 60 days public consultation and to announce it one day before its official start. The Procedures defines that the announcement is made at the Association's website and is distributed to stakeholders.
	Process	YES	<p>The public announcement of the public consultation at the applicant's website^[10], E-mail correspondence to stakeholders^[13] as well as the announcements made at Facebook^[11, 12] indicate 60 days public consultation period.</p> <p>Compliance: Conformity</p> <p>Justification: r</p> <p>The public consultation lasted 60 days.</p>
(f) all feedback is considered by the working group in an objective manner, and	Procedures	YES	<p>UA SFM ST 01, 6.5.7: "The working group compiles a summary of comments and suggestions on the first edition of the draft standard and finalizes the draft standard taking into account the comments and suggestions adopted by it (Annex B)."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The comments from public consultation are required to be considered by the Working Group.</p>
	Process	YES	<p>The applicant has received 101 comments from 6 organisations/individuals^[15]. The working group considered the comments at its meeting held on 28-30 April 2020 (Appendix 9 to the Development Report). On 4/5/2020, the applicant published at its website an announcement^[14] on the end of the public consultation with links to the synopsis of received comments and their consideration (Appendix 8 to the Development Report) and a summary report on the public consultation^[15]. Out of 101 comments, 31 were accepted, 20 were partially accepted, 14 were noted and 36 were rejected with notification^[15].</p> <p>All received comments and their consideration were compiled in a single document and made publicly available at the applicant's website. In addition, the Working Group also prepared a summary report on the public consultation.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Working Group considered all received comments.</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.	Procedures	YES	<p>UA SFM ST 01, 6.5.7: "The working group compiles a summary of comments and suggestions on the enquiry draft of the standard and finalizes the draft standard taking into account the comments and suggestions adopted by it (Annex B)."</p> <p>UA SFM ST 01, 6.5.8: "The Association shall post on the official website a short summary and public version of synopsis of comments and suggestions on the enquiry draft of the standard and provide responses to each stakeholder who submitted comments and suggestions on the draft standard."</p> <p>Note 1: Public version of synopsis of the comments and suggestions, which would be publish on the official website is</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
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>based on the Annex B, but it is not included names of organisations and natural persons who made the comments".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Procedures requires to prepare a summary of comments and suggestions, publish them at its website and respond to each stakeholder that submitted a comment/suggestion.</p> <p>The Procedures make reference to Annex B that includes a form for consideration of comments and includes both the comments/suggestions as well as results their consideration.</p> <p>The procedures also require that specific response is given to each stakeholder that submitted a comment.</p>
	Process	YES	<p>All received comments and their consideration were compiled in a single document (Appendix 9 to the Development Report) and made publicly available at the applicant's website^[14]. In addition, the Working Group also prepared a summary report on the public consultation^[15] and published it at its website^[14].</p> <p>The announcement of the end of the public consultation^[14] also included information that stakeholders that submitted their comments would receive a direct response on the comments consideration.</p> <p>The NVFCS sent an e-mail to each stakeholder that submitted a comment with results of the comment consideration^[28]</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The applicant has published a summary document with all comments and their consideration at its website.</p> <p>All stakeholders that submitted comments were sent an e-mail with results of their comments consideration.</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>UA SFM ST 01, 6.5.9: "For the new Forest Management Standard, the Association shall organize a second round of public discussion lasting at least 30 days similar to the process described in clause 6.5.2 - 6.5.8. Following the results of the second round of public discussion, the working group shall finalize the draft standard."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Procedures require a second 30 days consultation.</p>
	Process	YES	<p>On 5/5/2020, the applicant announced at its website^[16] a second public consultation lasting from 6/5/2020 until 4/6/2020 (30 days). The announcement includes a link to the draft standard as well as a form by which the comments should be submitted.</p> <p>On 5/5/2020, the second public consultation was also communicated by E-mail^[18]. to all identified stakeholders (Appendix 4 to the Development report, UA SFM TD 06).</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>The second consultation was also posted at the applicant's Facebook^[17].</p> <p>The Working Group considered at its meeting on 9-10/6/2020 (Appendix 11 of the Development Report) all comments received from the second public consultation. In total, the applicant received during the second round of public consultation 41 comments from 15 organisations/individuals, 17 comments were accepted, 7 were partially accepted, 13 were noted and 4 were rejected with justification^[20].</p> <p>On 16/06/2020, the applicant published at its website an announcement^[19] on the end of the second public consultation with a link to the summary of the received comments and their consideration (Appendix 10 to the Development Report) as well as a summary report on the public consultation^[20].</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The applicant conducted a second public consultation in compliance with the PEFC requirements.</p>
<p>6.6 The standardising body shall organise pilot testing of new standard(s) to assess the clarity, auditability and feasibility of the requirements. The working group shall consider the outcome of pilot testing.</p> <p>NOTE Pilot testing is not required for revision of an existing standard when experience from its usage can substitute for pilot testing.</p>	Procedures	YES	<p>UA SFM ST 01, 6.6.1: "The Association shall organize field testing of the new standard to assess the unambiguity, verifiability and feasibility of the requirements".</p> <p>UA SFM ST 01, 6.6.2: "The draft standard shall be tested in the different conditions to which it will be applied, taking into account the type of forests, the scale and ownership and other criteria."</p> <p>UA SFM ST 01, 6.6.4: "Field testing shall cover the full range of requirements included in the draft standard, and assess the feasibility of the standard as a whole, as well as the socio-economic consequences of the standard".</p> <p>UA SFM ST 01, 6.6.6: "The working group shall study the results of the field testing and finalize the draft standard based on the results obtained. At this stage, to speed up the process, it is allowed to finalize the standard without the participation of a wide range of stakeholders (with technical edits that do not change the essence of the standard)."</p> <p>UA SFM ST 01, 6.6.7: "The Association shall post information on the results of field testing on the official website."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Procedures include comprehensive requirements for pilot testing, consideration of its results and their publication at the website.</p>
	Process	YES	<p>Following tender procedures, the applicant has selected SGS and Legalis LLC to conduct pilot testing on three forest enterprises (Korostyshiv forestry Agroindustrial Complex, Perechyn Forest Enterprise and Bereshanske forest enterprise)^[21].</p> <p>The pilot testing was evaluated based on the report prepared by Legalis LLC for two forest enterprises (Appendix 11 to the Development Report). The pilot testing comprehensively</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>evaluated forest management against all requirements of the draft forest management standard (version 20/4/2020).</p> <p>The pilot testing took three days for each forest enterprise and the audit team consisted of three experienced auditors. The audits included stakeholders consultation, office audit as well as a field audit.</p> <p>The report identified compliance with the draft standard, recommendations for interpretations and improvement of the standard and as well as consistency with legislation.</p> <p>The results of the field audit were considered by the Working Group on 9-10/6/2020 (Appendix 12 to the Development Report). The results of the pilot testing were also communicated at the applicant's website ^[22].</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The applicant conducted three pilot testing, considered its results and informed stakeholders about the outputs of the process.</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>UA SFM ST 01, 7.1.2: "The Head of the Association checks the following if there is evidence of consensus in the working group:</p> <ul style="list-style-type: none"> -- completeness of documents; - compliance with the name of the standard; - correctness of documents, the presence of original signatures and seals (if necessary)". <p>UA SFM ST 01, 7.1.3: "In case of positive results of document verification, the Head of the Association prepares a draft standard for approval by the Council of the Association. In case of non-compliance with at least one of the above requirements, the Head of the Association returns the documents for revision".</p> <p>UA SFM ST 01, 7.1.4: "The Council of the Association decides on the approval or rejection of the standard. Thus the decision on the statement of the standard is made out in the form of the administrative document in which the date of entry into force of the standard has to be specified".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Procedures require to check the outcomes of the Working Group work and formal approval of the standard.</p>
	Process	YES	<p>The General Meeting of the NVFCS formally approved the standard on 24 June 2020 (Appendix 13 to the Development Report).</p> <p>Compliance: Conformity</p> <p>Justification:</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			The standard was formally approved.
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>UA SFM ST 01, 7.1.4: "The Association shall post on the official website the notice of approval of the standard and the officially approved standard within 14 days after its approval".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Procedures require to publish the standard within 14 days from the formal approval. The website publication also implies that the document is free of charge.</p>
	Process	YES	<p>The forest management standard as well as the whole scheme documentation is publicly available from the applicant's website^[23].</p> <p>The applicant announced the formal approval of the standard at its website on 26/6/2020 with a link to the approved standard^[24].</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The formally approved standard was published on 26/6/2020, two days after the formal approval. The standard as well as the whole scheme documentation is freely available from the website.</p>
7.2.2 Standard(s) shall include:			
(a) identification and contact information for the standardising body,	Procedures	YES	<p>UA SFM ST 01, 7.2.2: "The standard shall include: a) contact information of the Association".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Procedures satisfy the requirement.</p>
	Process	YES	<p>UA SFM ST 02 (the forest management standard) includes identification of the applicant, the standard-setting body.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>UA SFM ST 02 satisfies the requirement.</p>
(b) official language of the standard,	Procedures	YES	<p>UA SFM ST 01, 7.2.2: "The standard shall include: b) the official language of the standard;..."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Procedures satisfy the requirement.</p>
	Process	YES	<p>UA SFM ST 02 copyright notice: "The official version of the document is Ukrainian. In case of any doubt the English version is decisive."</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			Compliance: Conformity Justification: UA SFM ST 02 satisfies the requirement.
(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	UA SFM ST 01, 7.2.2: "The standard shall include: c) a note that in case of discrepancies between the versions, the English version of the standard approved by the PEFC Council is for reference only;...". Compliance: Conformity Justification: The Procedures satisfy the requirement.
	Process	YES	UA SFM ST 02 copyright notice: "The official version of the document is Ukrainian. In case of any doubt the English version is decisive." Compliance: Conformity Justification: UA SFM ST 02 satisfies the requirement.
(d) The approval date and the date of next periodic review NOTE The date of next periodic review may be within a shorter period than five years based on (for example) stakeholder expectations or other foreseen developments.	Procedures	YES	UA SFM ST 01, 7.2.2: "The standard shall include: d) the date of approval and the date of the next periodic review of the standard. Note: The date of the next periodic review of the standard may be less than five years, based on stakeholder expectations or other expected changes." Compliance: Conformity Justification: The procedures require the standard to include both the approval date as well as the date of the next periodic review.
	Process	YES	UA SFM ST 02 defines (page 2) the "Approval date" for first (24.6.2020) as well as the second edition (25.2.2021) of the standard. It also includes the "Review date" of 26/5/2025 (no later than). Compliance: Conformity Justification: UA SFM ST 02 includes both the approval date as well as the review date.
7.2.3 Printed copies shall be made available upon request at a price that covers no more than administrative costs (if any)	Procedures	YES	UA SFM ST 01, 7.2.3: "Printed copies of the approved standard are available on request at a price that covers only administrative costs". Compliance: Conformity Justification: The Procedures satisfy the requirement.

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
	Process	YES	<p>The assessor has not received any information that would indicate that the applicant has rejected to provide a printed copy of the forest management standard.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The applicant satisfies the requirement.</p>
7.2.4 The standardising body shall make the development report (refer to PEFC GD 1007) publicly available	Procedures	YES	<p>UA SFM ST 01, 7.2.4: "The Association shall make the report on its development publicly available in accordance with the requirements of PEFC GD 1007".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Procedures satisfy the requirement.</p>
	Process	YES	<p>The applicant has prepared the Development Report that satisfies PEFC GD 1007. The applicant made the report publicly available through its website^[25].</p>
Periodic review of standards			
8.1 The standard(s)/normative document(s) shall be reviewed at intervals that do not exceed a five-year period. The review shall be based on consideration of feedback received during the standard's implementation and a gap analysis. If necessary, a stakeholder consultation shall be organised to obtain further feedback and input.	Procedures	YES	<p>UA SFM ST 01, 8.1: "The standard(s)/normative document(s) shall be reviewed at intervals that do not exceed a five-year period. The review shall be based on consideration of feedback received during the standard's implementation and a gap analysis. If necessary, a stakeholder consultation shall be organized to obtain further feedback and input".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Procedures satisfy the requirement.</p>
	Process	N/A	Initial development of the standard.
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>UA SFM ST 01, 8.2.1: "The Association shall establish and maintain a permanent mechanism for collecting and recording feedback on the standard during its implementation and application. This mechanism shall be available on the official website of the Association.</p> <p>Note: Feedback can be sent in various formats: suggestions, comments, proposals, requests for clarification and / or interpretation, complaints, etc.".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Procedures satisfy the requirement.</p>

PEFC benchmark requirement	Assessment basis	YES/NO	Reference to system documentation (including quotation of relevant text)
NOTE Feedback can be sent in various formats: comments, requests for clarification and/or interpretation, complaints, etc.	Process	N/A	Initial development of the standard.
8.2.2 All feedback received through all channels, including meetings, training courses, etc. shall be recorded and considered.	Procedures	YES	<p>UA SFM ST 01, 8.2.1: "The Association should collect and systematize all feedback received from various communication channels, including round tables, seminars, training courses, etc., register, review, analyze, summarize, assess their relevance and determine how to update the standard (in the form of development changes, view or view in a short time)."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Procedures satisfy the requirement.</p>
	Process	N/A	Initial development of the standard.
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>UA SFM ST 01, 8.3.1: "The Association shall regularly review the content of the standard to identify the need to update it, which shall be aimed at:</p> <ul style="list-style-type: none"> - ensuring compliance with PEFC requirements; - elimination of contradictions with the current and those norms of the legislation of Ukraine which are offered for introduction; - bringing the standard in line with newly concluded international agreements; - dissemination of best practices, improving the quality of forest management in accordance with the level of development of science, techniques and technology, expectations of stakeholders, market requirements, economy; - exclusion of references to repealed standards". <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Procedures specify review the standard against the PEFC requirements, national legislation, international agreements and other sources.</p>
	Process	N/A	Initial development of the standard.
8.3.2 The standardising body shall consider the latest scientific knowledge, research and relevant emerging issues.	Procedures	YES	<p>UA SFM ST 01, 8.3.1: "The Association shall regularly review the content of the standard to identify the need to update it, which shall be aimed at...:</p> <ul style="list-style-type: none"> - dissemination of best practices, improving the quality of forest management in accordance with the level of development of science, techniques and technology, expectations of stakeholders, market requirements, economy;..."

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			Compliance: Conformity Justification: The Procedures satisfy the requirement.
	Process	N/A	Initial development of the standard.
8.4.1 Where the feedback and the gap analysis do not identify a need to revise the standard, the standardising body shall organise stakeholder consultation to determine whether stakeholders see a need for revising the standard. The standardising body shall include the gap analysis in the stakeholder consultation.	Procedures	YES	UA SFM ST 01, 8.4.1: "In the event that feedback on the standard and gap analysis do not identify a need for revising it, the Association shall organize a public consultation with stakeholders to determine whether stakeholders see a need for revising the standard. The Association shall include the gap analysis in the stakeholder consultation". Compliance: Conformity Justification: The Procedures require to carry out public consultation where the gap analysis do not identify the need for revision.
	Process	N/A	Initial development of the standard.
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	UA SFM ST 01, 8.4.2: "Before the public consultation, the Association shall update the list of stakeholders (clause 6.2)." Compliance: Conformity Justification: The Procedures satisfy the requirement.
	Process	N/A	Initial development of the standard.
8.4.3 The standardising body shall organise:			
(a) a public consultation period of at least 30 days (following the requirements of clause 6.5.1) and/or,	Procedures	YES	UA SFM ST 01, 8.4.3: "The Association shall organize a public consultation lasting at least 30 days and arrange a meeting with stakeholders." Compliance: Conformity Justification: The Procedures satisfy the requirement.
	Process	N/A	Initial development of the standard.
(b) stakeholder meetings.	Procedures	YES	UA SFM ST 01, 8.4.3: "The Association shall organize a public consultation lasting at least 30 days and arrange a meeting with stakeholders." Compliance: Conformity

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			Justification: The Procedures satisfy the requirement.
	Process	N/A	Initial development of the standard.
8.4.4 The standardising body shall announce the review in a timely manner (refer to 6.3).	Procedures	YES	UA SFM ST 01, 8.4.4: "The Association shall announce the review of the standard in a timely manner (clause 6.3)." Compliance: Conformity Justification: The Procedures satisfy the requirement.
	Process	N/A	Initial development of the standard.
8.5.1 Based on the feedback received during the period of a standard's implementation, the outcome of the gap analysis and the consultations, the standardising body shall decide whether to reaffirm the standard or whether a revision of the standard is necessary.	Procedures	YES	UA SFM ST 01, 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 Association shall decide whether to reaffirm the standard or whether a revision of the standard is necessary." Compliance: Conformity Justification: The Procedures satisfy the requirement.
	Process	N/A	Initial development of the standard.
8.5.2 The decision shall be made at the highest decision-making level of the standardising body	Procedures	YES	UA SFM ST 01, 8.5.1: "The decision to update or confirm the standard shall be made by the General Meeting of the Council of the Association National Voluntary Forest Certification System." Compliance: Conformity Justification: The Procedures satisfy the requirement.
	Process	N/A	Initial development of the standard.
8.5.3 Where the decision is to reaffirm a standard, the standardising body shall provide a justification for the decision and make the justification publicly available.	Procedures	YES	UA SFM ST 01, 8.5.2: "Where the decision is to reaffirm a standard, the Association shall provide a justification for the decision and make the justification available on the official website." Compliance: Conformity Justification: The Procedures satisfy the requirement.
	Process	N/A	Initial development of the standard.

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
8.5.4 Where the decision is to revise the standard, the standardising body shall specify the type of revision (normal or editorial revision).	Procedures	YES	<p>UA SFM ST 01, 8.5.2: "Where the decision is to revise the standard, the Association shall specify the type of revision (normal or editorial revision)."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Procedures satisfy the requirement.</p>
	Process	N/A	Initial development of the standard.
Revision of standards			
9.1 Procedures for revision of standard(s)/normative document(s) shall conform to those stated in section 6. A normal revision can occur at the periodic review, or between periodic reviews, but does not include editorial revisions and time-critical revisions.	Procedures	YES	<p>UA SFM ST 01, 9.2.1: "Revision of the standard is necessary when making significant changes to its content and / or structure, as well as when making new and / or more progressive requirements".</p> <p>UA SFM ST 01, 9.2.2: "The revision may take place during the periodic review or between the periodic reviews, but it does not include the development of editorial revisions to the standard and the review in a short time".</p> <p>UA SFM ST 01, 9.2.3: "When a standard is revised, a new standard is developed to replace the current one. At the same time, the development of the standard, its approval, registration, publication and implementation are carried out in accordance with the procedure established in section 6. As a rule, a working group on standard development is involved as a developer of the updated standard".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Procedures satisfy the requirement.</p>
	Process	N/A	Initial development of the standard.
9.2 Editorial revisions can be made without triggering the normal revision process. The standardising body shall approve the editorial changes formally and publish an amendment or a new edition of the standard.	Procedures	YES	<p>UA SFM ST 01, 9.1.1: "Editorial revisions to the standard can be developed without starting the revision process, if the changes are only editorial (linguistic) and / or control in nature.</p> <p>UA SFM ST 01, 9.1.2: "The development of editorial revisions to the standard, its approval and registration shall be carried out in accordance with the rules set out in paragraph 7 of this standard. It is recommended to involve the working group on standard development in full or reduced composition as a developer of editorial revisions to the standard".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Procedures satisfy the requirement.</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
	Process	N/A	Initial development of the standard.
9.3.1 A time-critical revision is a revision between two periodic reviews using a fast-track process.	Procedures	YES	<p>UA SFM ST 01, 9.3.1: "Time-critical revision of the standard is a review between two periodic reviews using an fast-track process".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Procedures satisfy the requirement.</p>
	Process	N/A	Initial development of the standard.
9.3.2 A time-critical revision can be conducted only in the following situations:			
(a) Change in national laws and regulations affecting compliance with PEFC International requirements	Procedures	YES	<p>UA SFM ST 01, 9.3.2: "A time-critical revision can be conducted only in the following situations: a) Change in national laws and regulations affecting compliance with PEFC International requirements".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Procedures satisfy the requirement.</p>
	Process	N/A	Initial development of the standard.
(b) Instruction by PEFC International to comply with specific or new PEFC requirements within a timescale that is too short for a normal revision.	Procedures	YES	<p>UA SFM ST 01, 9.3.2: "A time-critical revision can be conducted only in the following situations: b) Instruction by PEFC International to comply with specific or new PEFC requirements within a timescale that is too short for a normal revision".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Procedures satisfy the requirement.</p>
	Process	N/A	Initial development of the standard.
9.3.3 The time-critical revision shall follow these steps:			
(a) The standardising body shall draft the revised standard,	Procedures	YES	<p>UA SFM ST 01, 9.3.3: "The time-critical revision shall follow these steps: a) The Association shall draft the revised standard".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Procedures satisfy the requirement.</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
	Process	N/A	Initial development of the standard.
(b) The standardising body may consult stakeholders, but it is not mandatory,	Procedures	YES	<p>UA SFM ST 01, 9.3.3: "The time-critical revision shall follow these steps: b) the Association may consult stakeholders, but it is not mandatory".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Procedures satisfy the requirement.</p>
	Process	N/A	Initial development of the standard.
(c) The revised standard shall be approved formally at the highest appropriate decision-making level of the standardising body,	Procedures	YES	<p>UA SFM ST 01, 9.3.3: "The time-critical revision shall follow these steps: c) The time-critical revision shall follow these steps: c) The revised standard shall be approved formally approved by the General Meeting of the Council of the Association National Voluntary Forest Certification System".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Procedures satisfy the requirement.</p>
	Process	N/A	Initial development of the standard.
(d) The standardising body shall explain the justification for the urgent change(s) and make the justification publicly available.	Procedures	YES	<p>UA SFM ST 01, 9.3.3: "The time-critical revision shall follow these steps: d) The Association shall explain the justification for the urgent change(s) and make the justification available on the website of the Association".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Procedures satisfy the requirement.</p>
	Process	N/A	Initial development of the standard.
9.4.1 A revision shall define the application date and transition period of the revised standard(s)/normative document(s).	Procedures	YES	<p>UA SFM ST 01, 9.4.1: "The revision shall establish the application date and transition period of the revised standard.".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Procedures satisfy the requirement.</p>
	Process	N/A	Initial development of the standard.
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	Procedures	YES	<p>UA SFM ST 01, 9.4.2: "An application date shall not exceed one year after the publication of the standard".</p> <p>Compliance: Conformity</p> <p>Justification:</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
the revised standard(s)/normative document(s), introduction of change(s), information dissemination and training.			The Procedures satisfy the requirement.
	Process	N/A	Initial development of the standard.
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>UA SFM ST 01, 9.4.3: "The transition period shall not exceed one year. The Association may determine a longer period only in exceptional cases".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Procedures satisfy the requirement.</p>
	Process	N/A	Initial development of the standard.

Annex B: Detailed assessment of the group certification model

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
4. Context of the group organisation		
4.1 Understanding the group organisation and its context		
The standard shall define how relevant external and internal issues of the group organisation shall be determined. A general framework for the group organisation shall be determined:		
a) regional groups: group of forest owners/managers defined by regional borders and	N/A	<p>UA SFM ST 03, 4.1:</p> <p>“4.1.3 A group organisation can be formed by:</p> <p>a) independent legal and/or natural persons, forest owners/forest users, who have permanent use/ownership of forests and who can be characterized as small forestries/small forest owners. The group entity can be one of the participants, or a specially formed body, such as an association;</p> <p>b) public forestries in the territory of the relevant administrative division subordinated to the territorial body implementing the state policy in the field of forestry and hunting. The group entity can be one of the participants or the specified territorial body;</p> <p>c) subsidiaries of communal form of incorporation of one parent (main) enterprise. The group entity can be one of the participants or a specified main enterprise;</p> <p>d) other participant categories, e.g. in the framework of regional forestry development programmes - forest owners/forest users of a certain region, irrespective of the form of incorporation and departmental subordination. The group entity can be one of the participants or other specially formed body”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The scheme is using throughout the document terms relating to the “group certification”. Only in chapter definitions it is making explanatory notes relating to the term “regional” certification.</p> <p>Chapter 4.1.3 than describes different optional organisational arrangements where some of them would meet characteristics of the regional group certification, i.e., geographically limited groups.</p>
b) other groups and/or	YES	<p>UA SFM ST 03, 4.1:</p> <p>“4.1.1 Group forest certification within NVFCS can be carried out by forest owners/forest users in the territory of Ukraine that voluntarily unite in a group organisation to meet the requirements of UA SFM ST 02 Sustainable Forest Management. Requirements and obtain a group forest management certificate.</p> <p>4.1.2 The group organisation includes participants represented by the group entity, as specified in clause 3.12.</p> <p>4.1.3 A group organisation can be formed by:</p> <p>a) independent legal and/or natural persons, forest owners/forest users, who have permanent use/ownership of forests and who can be characterized as small</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>forestries/small forest owners. The group entity can be one of the participants, or a specially formed body, such as an association;</p> <p>b) public forestries in the territory of the relevant administrative division subordinated to the territorial body implementing the state policy in the field of forestry and hunting. The group entity can be one of the participants or the specified territorial body;</p> <p>c) subsidiaries of communal form of incorporation of one parent (main) enterprise. The group entity can be one of the participants or a specified main enterprise;</p> <p>d) other participant categories, e.g., in the framework of regional forestry development programmes - forest owners/forest users of a certain region, irrespective of the form of incorporation and departmental subordination. The group entity can be one of the participants or other specially formed body".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>Chapter 4.1.1 and 4.1.2 provide general organisational aspects of the group certification.</p> <p>Chapter 4.1.3 than describes different optional organisational arrangements where some of them would meet characteristics of the regional group certification, i.e., geographically limited groups.</p> <p>The requirements under chapter 4.1 are then supported by definitions relating to the group certification.</p>
c) whether there are any other specific circumstances which influence the implementation of the group management system.	YES	<p>UA SFM ST 03, 4.1.4 "The group organisation shall identify external and internal (positive and negative) factors that may affect its structure and ability for sustainable forest management".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>Chapter 4.1.4 requires to identify additional external and internal factors influencing the group certification.</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>UA SFM ST 03, 4.2.1: "A group organisation shall determine the following within the scope of this standard:</p> <p>a) affected stakeholders for the group management system, as referred to in clause 3.1, given that this list is not exhaustive. Affected stakeholders need to be identified for each participant and for the group organisation as a whole."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>Chapter 4.2.1 requires to identify affected stakeholders.</p>
b) the relevant expectations of these affected stakeholders.	YES	<p>UA SFM ST 03, 4.2.1: "A group organisation shall determine the following within the scope of this standard:</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>b) relevant expectations of these affected stakeholders, depending on their category (local communities, employees and service providers (contractors), related land users registered in local communities, local forest product processors, etc.) regarding indicators of criteria of UA SFM ST 02 Sustainable forest management”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>Chapter 4.2.1 requires to relevant expectations of affected stakeholders.</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>UA SFM ST 03</p> <p>“3.7 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 to the sustainable forest management standard and other applicable requirements of the forest certification system. For this purpose, the group entity is using a group management system”.</p> <p>“3.12 Group organisation</p> <p>A group of participants, represented by the group entity, for the purposes of implementation of the sustainable forest management standard and its certification. A binding written agreement shall be established between a participant and the group entity.</p> <p>The term "group organisation" is equivalent to the term "regional organisation" if the group is defined by regional boundaries or other terms chosen by the relevant forest certification scheme and complying with the content of this definition.”</p> <p>“3.16 Participant</p> <p>A forest owner/forest user, covered by the group forest certificate, who has the ability to implement the requirements of the sustainable forest management standard in a certified area.</p> <p>Note: the term "ability to implement the requirements of the sustainable forest management standard" requires the entity to have a long-term legal right, tenure right or traditional or customary tenure rights to manage the forest and would disqualify one-off contractors from becoming participants in group forest management certification”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The definitions are identical to those defined in PEFC ST 1002:2018.</p>
b) the certified area,	YES	<p>UA SFM ST 03</p> <p>“3.3 Certified area</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>The forest area covered by a sustainable forest management system according to the PEFC Sustainable Forest Management Standard UA SFM ST 02.</p> <p>In the group certification context the certified area is the sum of forest areas of the participants of group forest certification, covered by a group forest certificate."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The definitions are identical to those defined in PEFC ST 1002:2018.</p>
c) the group certificate and	YES	<p>UA SFM ST 03</p> <p>"3.8 Group forest certificate</p> <p>A document confirming that the group organisation complies with the requirements of a sustainable forest management standard and other applicable requirements of the forest certification system".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The definitions are identical to those defined in PEFC ST 1002:2018.</p>
d) the document confirming participation in group certification.	YES	<p>UA SFM ST 03:</p> <p>"3.5 Document confirming participation in group forest certification</p> <p>A document issued to a participant that refers to the group forest certificate and that confirms the participant as being covered by the scope of the group forest certification".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The definitions are identical to those 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>UA SFM ST 03, 4.3.2: "The group organisation shall define the limits and appropriateness of the group management system to determine the scope of the group management system, taking into account external and internal factors, as specified in clause 4.1.4, the expectations of affected stakeholders, as specified in clause 4.2.1, and the specifics of the group forming, as specified in clause 4.1.3".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document requires to define the scope of the group management system.</p>
4.3.3 The standard shall define which requirements of the sustainable forest management standard may be fulfilled on group level.	YES	<p>UA SFM ST 03, 4.3.3: "Each participant shall comply with all the basic requirements of UA SFM ST 02 Sustainable Forest Management. Requirements, except for clauses 9.2 Internal Audit and 9.3 Assessment of the management system, which may be complied with by the group entity."</p> <p>Compliance: Conformity</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Justification: The document requires that clauses 9.2 and 9.3 are to be fulfilled at the group level.
4.3.4 The standard requires that the scope shall be made available as documented information.	YES	UA SFM ST 03, 4.3.3: "The group entity shall ensure that the scope is accessible as documented information to all stakeholders." Compliance: Conformity Justification: The document requires the scope to be available as documented information.
4.4 Group management system		
4.4.1 The standard requires that all participants shall be subject to the internal monitoring and the internal audit programme.	YES	UA SFM ST 03, 4.4.1: "The group entity shall monitor and conduct internal audit to all participants in the group forest certification, as specified in clause 9". Compliance: Conformity Justification: The document requires monitoring and internal audit programme. Chapter 9 then applies to the whole group organisation, including all participants (9.1.1, 9.2.1.2).
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	UA SFM ST 03, 4.4.2: "If the group entity acts as a trader(s) in timber not covered by the group certification, it (they) shall additionally obtain a PEFC chain of custody certificate." Compliance: Conformity Justification: The document requires the group entity to obtain PEFC CoC certification if it trades timber not covered by the group certification.
5. Leadership		
5.1 Organisational roles, responsibilities and authorities		
5.1.1 Functions and responsibilities of the group entity		
The standard requires that the following functions and responsibilities of the group entity shall be specified:		
a) to implement and maintain an effective management system covering all participants of the group;	YES	UA SFM ST 03, 5.1.1.1 "NVFCS stipulates that the group entity in the process of group forest certification shall: a) implement and maintain an effective management system covering all participants of the group"; Compliance: Conformity Justification: The document includes an identical requirement to PEFC ST 1002:2018.
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	YES	UA SFM ST 03, 5.1.1.1 "NVFCS stipulates that the group entity in the process of group forest certification shall: b) represent the group organisation in the certification process, including in communications and relationships with the certification body, submission of an application

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
contractual relationship with the certification body;		for certification, and contractual relationship with the certification body;". Compliance: Conformity Justification: The document includes an identical requirement to PEFC ST 1002:2018.
c) to establish written procedures for the management of the group organisation;	YES	UA SFM ST 03, 5.1.1.1 "NVFCS stipulates that the group entity in the process of group forest certification shall: c) establish written procedures for the management of the group organisation;" Compliance: Conformity Justification: The document includes an identical requirement to PEFC ST 1002:2018.
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	UA SFM ST 03, 5.1.1.1 "NVFCS stipulates that the group entity in the process of group forest certification shall: d) 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);" Compliance: Conformity Justification: The document includes an identical requirement to PEFC ST 1002:2018.
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	UA SFM ST 03, 5.1.1.1 "NVFCS stipulates that the group entity in the process of group forest certification shall: e) 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;" Compliance: Conformity Justification: The document includes an identical requirement to PEFC ST 1002:2018.
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	YES	UA SFM ST 03, 5.1.1.1 "NVFCS stipulates that the group entity in the process of group forest certification shall: f) 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 NVFCS; 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, its review and any preventive and/or corrective actions taken;"

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
any preventive and/or corrective actions taken;		Compliance: Conformity Justification: The document includes an identical requirement to PEFC ST 1002:2018.
<p>g) to establish connections with all participants based on a binding written agreement which shall include the participants' commitment to comply with the sustainable forest management standard. The group entity shall have a written contract or other written agreement with all participants covering the right of the group entity to implement and enforce any corrective or preventive measures, and to initiate the exclusion of any participant from the scope of certification in the event of nonconformity with the sustainable forest management standard;</p> <p>Note: The requirements for "participant' commitment" and "written contract or other written agreement with all participants" may also be satisfied by the commitment of and written agreement of a pre-existing organisation or group or the members participation, such as a forest owners'/managers' association, SFM programme and submission to tax programming, where the organisation can demonstrate that it has a legal mandate to represent the participants and where its commitment and the terms and conditions of the contract are enforceable.</p>	YES	<p>UA SFM ST 03, 5.1.1.1 "NVFCS stipulates that the group entity in the process of group forest certification shall:</p> <p>g) establish connections with all participants based on a binding written agreement which shall include the participants' commitment to comply with the sustainable forest management standard. The group entity shall have a written contract or other written agreement with all participants, covering the right of the group entity to implement and enforce any corrective or preventive measures, and to initiate the exclusion of any participant from the scope of certification in the event of nonconformity with the sustainable forest management standard;</p> <p>Note: The requirements for "participants' commitment" and "written contract or other written agreement with all participants" may also be satisfied by the commitment of and written agreement of a pre-existing organisation or group or the members participation, such as:</p> <ul style="list-style-type: none"> – a forest owners/forest users association; – b) subordination in the territory of the relevant administrative division to the territorial body implementing the state policy in the field of forestry and hunting; – parent (main) enterprise and subsidiaries; – SFM programme; – tax offices, 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>Compliance: Conformity Justification: The document includes an identical requirement to PEFC ST 1002:2018. The Note defines specific application of the "pre-existing organisations".</p>
h) to provide all participants with a document confirming participation in the group forest certification;	YES	<p>UA SFM ST 03, 5.1.1.1 "NVFCS stipulates that the group entity in the process of group forest certification shall:</p> <p>h) provide all participants with a document confirming participation in the group forest certification;"</p> <p>Compliance: Conformity Justification: The document includes an identical requirement to PEFC ST 1002:2018.</p>
i) to provide all participants with information and guidance required for the effective implementation and	YES	<p>UA SFM ST 03, 5.1.1.1 "NVFCS stipulates that the group entity in the process of group forest certification shall:</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
maintenance of the sustainable forest management standard and other applicable requirements of the forest certification system;		<p>i) 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 NVFCS;"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document includes an identical requirement to PEFC ST 1002:2018.</p>
j) to address nonconformities reported from group members which were identified under other PEFC certifications than the particular group certification and to ensure implementation with all group members;	YES	<p>UA SFM ST 03, 5.1.1.1 "NVFCS stipulates that the group entity in the process of group forest certification shall:</p> <p>j) address nonconformities reported from group members which were identified under other PEFC certifications than the particular PEFC group certification and to ensure implementation with all group members;"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document includes an identical requirement to PEFC ST 1002:2018.</p>
k) to operate an internal monitoring programme that provides for the evaluation of the participants' conformity with the certification requirements;	YES	<p>UA SFM ST 03, 5.1.1.1 "NVFCS stipulates that the group entity in the process of group forest certification shall:</p> <p>k) operate an internal monitoring programme that provides for the evaluation of the participants' conformity with the certification requirements;"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document includes an identical requirement to PEFC ST 1002:2018.</p>
l) to operate an annual internal audit programme covering both group members and group entity;	YES	<p>UA SFM ST 03, 5.1.1.1 "NVFCS stipulates that the group entity in the process of group forest certification shall:</p> <p>l) operate an annual internal audit, programme covering both group members and group entity"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document includes an identical requirement to PEFC ST 1002:2018.</p>
m) to operate a management review of the group forest certification and acting on the results from the review;	YES	<p>UA SFM ST 03, 5.1.1.1 "NVFCS stipulates that the group entity in the process of group forest certification shall:</p> <p>m) operate a management review of the group forest certification and acting on the results from the review;"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document includes an identical requirement to PEFC ST 1002:2018.</p>
n) to provide full co-operation and assistance in responding effectively to all requests from the certification body, accreditation body, PEFC International or the National Governing Body for relevant	YES	<p>UA SFM ST 03, 5.1.1.1 "NVFCS stipulates that the group entity in the process of group forest certification shall:</p> <p>n) provide full co-operation and assistance in responding effectively to all requests from the certification body, accreditation body, NVFCS, PEFC International</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
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.		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." Compliance: Conformity Justification: The document includes an identical requirement to PEFC ST 1002:2018.
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 participants excluded from any certification group cannot apply for group membership within 12 months after exclusion. Note: The requirement for "written agreement" and participants' "commitment" is also satisfied by the commitment of and written agreement of a pre-existing organisation or group or the members participation, such as a forest owners'/managers' association, SFM programme and submission to tax programming, where the organisation can demonstrate that it has a legal mandate to represent the participants and where its commitment and the terms and conditions of the contract are enforceable.	YES	UA SFM ST 03, 5.1.2.1: "NVFCS stipulates that the participants of the group forest certification in the process of group forest certification shall: a) 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 NVFCS; group participants excluded from any certification group cannot apply for group membership within 12 months after exclusion; Note: The requirements for "participants' commitment" and "written contract or other written agreement with all participants" may also be satisfied by the commitment of and written agreement of a pre-existing organisation or group or the members participation, such as: – a forest owners/forest users association; – b) subordination in the territory of the relevant administrative division to the territorial body implementing the state policy in the field of forestry and hunting; – parent (main) enterprises and subsidiaries; – SFM programme; – tax offices, 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 the group entity and participants. It also requires 12 months period between exclusion of the participant and new enrolment.
b) To provide the group entity with information about previous group participation.	YES	UA SFM ST 03, 5.1.2.1: "NVFCS stipulates that the participants of the group forest certification in the process of group forest certification shall: b) provide the group entity with information about previous group participation;" Compliance: Conformity

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Justification: The document includes an identical requirement to PEFC ST 1002:2018.
c) to comply with the sustainable forest management standard and other applicable requirements of the certification system as well as with the requirements of the management system;	YES	UA SFM ST 03, 5.1.2.1: "NVFCS stipulates that the participants of the group forest certification in the process of group forest certification shall: c) comply with the sustainable forest management standard and other applicable requirements of NVFCS, as well as with the requirements of the management system;" Compliance: Conformity Justification: The document includes an identical requirement to PEFC ST 1002:2018.
d) to provide full co-operation and assistance in responding effectively to all requests from the group entity, or certification body for relevant data, documentation or other information; allowing access to the forest and other facilities, whether in connection with formal audits or reviews or otherwise related or with implications for the management system;	YES	UA SFM ST 03, 5.1.2.1: "NVFCS stipulates that the participants of the group forest certification in the process of group forest certification shall: d) 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." Compliance: Conformity Justification: The document includes an identical requirement to PEFC ST 1002:2018.
e) to inform the group entity about nonconformities identified under other PEFC certifications than the particular group certification.	YES	UA SFM ST 03, 5.1.2.1: "NVFCS stipulates that the participants of the group forest certification in the process of group forest certification shall: e) inform the group entity about nonconformities identified under other PEFC certifications than the particular group certification." Compliance: Conformity Justification: The document includes an identical requirement to PEFC ST 1002:2018.
f) to implement relevant corrective and preventive actions established by the group entity.	YES	UA SFM ST 03, 5.1.2.1: "NVFCS stipulates that the participants of the group forest certification in the process of group forest certification shall: f) implement relevant corrective and preventive actions established by the group entity." Compliance: Conformity Justification: The document includes an identical requirement to PEFC ST 1002:2018.
5.2 Commitment and policy		

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
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>UA SFM ST 03, 5.2.1: "The group entity shall undertake the following:</p> <p>a) to comply with the sustainable forest management standard and other applicable requirements of NVFCS;"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document includes an identical requirement to PEFC ST 1002:2018.</p>
b) to integrate the group certification requirements in the group management system;	YES	<p>UA SFM ST 03, 5.2.1: "The group entity shall undertake the following:</p> <p>b) to integrate the group certification requirements in the group management system;"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document includes an identical requirement to PEFC ST 1002:2018.</p>
c) to continuously improve the group management system;	YES	<p>UA SFM ST 03, 5.2.1: "The group entity shall undertake the following:</p> <p>c) to continuously improve the group management system;"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document includes an identical requirement to PEFC ST 1002:2018.</p>
d) to continuously support the improvement of the sustainable management of the land/forests by the participants.	YES	<p>UA SFM ST 03, 5.2.1: "The group entity shall undertake the following:</p> <p>d) to continuously support the improvement of the sustainable management of the land/forests by the participants."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document includes an identical requirement to PEFC ST 1002:2018.</p>
5.2.2 The commitment of the group entity may be part of a group management policy and shall be publicly available as documented information upon request.	YES	<p>UA SFM ST 03, 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."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document includes an identical requirement to PEFC ST 1002:2018.</p>
5.2.3 The standard requires that the participants shall provide a commitment		
a) to follow the rules of the management system;	YES	<p>UA SFM ST 03, 5.2.3: "The participants shall:</p> <p>a) follow the rules of the management system;"</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Compliance: Conformity Justification: The document includes an identical requirement to PEFC ST 1002:2018.
b) to implement the requirements of the sustainability standard in their operations in their area.	YES	UA SFM ST 03, 5.2.3: "The participants shall: b) implement the requirements of the sustainability standard in their operations in their area." Compliance: Conformity Justification: The document includes an identical requirement to PEFC ST 1002:2018.
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	UA SFM ST 03, 6.1: "Group forest management organisation when planning any changes in the group management system, shall include these changes in a group management plan." Compliance: Conformity Justification: The document includes an identical requirement to PEFC ST 1002:2018.
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	UA SFM ST 03, 6.2: "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." Compliance: Conformity Justification: The document includes an identical requirement to PEFC ST 1002:2018.
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	UA SFM ST 03, 7.1: "The group entity shall determine and provide resources needed to establish, implement, maintain and continually improve the group management system." Compliance: Conformity Justification: The document includes an identical requirement to PEFC ST 1002:2018.
7.2 The standard shall define the necessary competence of persons doing work in the group management system.	YES	UA SFM ST 03, 7.2: "The group entity shall define the necessary competence of persons doing work in the group management system." Compliance: Conformity Justification: The document includes an identical requirement to PEFC ST 1002:2018.

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
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>UA SFM ST 03, 7.3: "The group entity shall arrange communication processes to raise awareness of the participants regarding:</p> <p>a) the group management policy;"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document includes an identical requirement to PEFC ST 1002:2018.</p>
b) the requirements of the sustainable forest management standard;	YES	<p>UA SFM ST 03, 7.3: "The group entity shall arrange communication processes to raise awareness of the participants regarding:</p> <p>b) the requirements of the sustainable forest management standard;"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document includes an identical requirement to PEFC ST 1002:2018.</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>UA SFM ST 03, 7.3: "The group entity shall arrange communication processes to raise awareness of the participants regarding:</p> <p>c) their contribution to the effectiveness of the group management system and the sustainable forest management, including the benefits of improved group performance;"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document includes an identical requirement to PEFC ST 1002:2018.</p>
d) the implications of not conforming with the group management system requirements.	YES	<p>UA SFM ST 03, 7.3: "The group entity shall arrange communication processes to raise awareness of the participants regarding:</p> <p>d) the implications of not conforming with the group management system requirements."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document includes an identical requirement to PEFC ST 1002:2018.</p>
7.4 The standard requires that the internal and external communications relevant to the group management system shall be determined. This includes:		
a) on what to communicate;	YES	<p>UA SFM ST 03, 7.4: "The group entity shall determine the internal and external communications relevant to the group management system, in particular:</p> <p>a) on what to communicate;"</p> <p>Compliance: Conformity</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Justification: The document includes an identical requirement to PEFC ST 1002:2018.
b) when to communicate;	YES	UA SFM ST 03, 7.4: "The group entity shall determine the internal and external communications relevant to the group management system, in particular: b) when to communicate;" Compliance: Conformity Justification: The document includes an identical requirement to PEFC ST 1002:2018.
c) with whom to communicate;	YES	UA SFM ST 03, 7.4: "The group entity shall determine the internal and external communications relevant to the group management system, in particular: c) with whom to communicate;" Compliance: Conformity Justification: The document includes an identical requirement to PEFC ST 1002:2018.
d) how to communicate.	YES	UA SFM ST 03, 7.4: "The group entity shall determine the internal and external communications relevant to the group management system, in particular: d) how to communicate." Compliance: Conformity Justification: The document includes an identical requirement to PEFC ST 1002:2018.
7.5 The standard requires that appropriate mechanisms shall be in place for resolving complaints and disputes relating to group management and sustainable forest management operations.	YES	UA SFM ST 03, 7.5: "The group entity shall form appropriate mechanisms for resolving complaints and disputes relating to group management and sustainable forest management operations." Compliance: Conformity Justification: The document includes an identical requirement to PEFC ST 1002:2018.
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	UA SFM ST 03, 7.6: "The group entity shall ensure 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;" Compliance: Conformity Justification:

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		The document includes an identical requirement to PEFC ST 1002:2018.
b) available and suitable for use, where and when it is needed;	YES	<p>UA SFM ST 03, 7.6: "The group entity shall ensure that the documented information, relevant to the group management system and the conformance with the requirements of the sustainable forest management standard is:</p> <p>b) available and suitable for use, where and when it is needed;"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document includes an identical requirement to PEFC ST 1002:2018.</p>
c) adequately protected against loss of confidentiality, improper use, or loss of integrity.	YES	<p>UA SFM ST 03, 7.6: "The group entity shall ensure that the documented information, relevant to the group management system and the conformance with the requirements of the sustainable forest management standard is:</p> <p>c) adequately protected against loss of confidentiality, improper use, or loss of integrity."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document includes an identical requirement to PEFC ST 1002:2018.</p>
8. Operation		
8.1 The standard requires that the group organisation shall plan, implement and control processes needed:		
a) to meet the requirements of the group certification standard and the sustainable forest management standard and	YES	<p>UA SFM ST 03, 8.1: "Group forest management organisation shall plan, implement and control processes necessary:</p> <p>b) to implement the actions determined in clause 6."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document includes an identical requirement to PEFC ST 1002:2018.</p>
b) to implement the actions determined in 6.	YES	<p>UA SFM ST 03, 8.1: "Group forest management organisation shall plan, implement and control processes necessary:</p> <p>a) to meet the requirements of the group certification standard and the sustainable forest management standard and"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document includes an identical requirement to PEFC ST 1002:2018.</p>
8.2 The standard requires that this planning, implementing and controlling shall be done by:		
a) defining the necessary processes and establishing criteria for those;	YES	UA SFM ST 03, 8.2: "The group entity shall plan, implement and control as follows:

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>a) define the necessary processes and establishing criteria for those;"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document includes an identical requirement to PEFC ST 1002:2018.</p>
b) implementing control of the processes in accordance with the criteria;	YES	<p>UA SFM ST 03, 8.2: "The group entity shall plan, implement and control as follows:</p> <p>b) implement control of the processes in accordance with the criteria;"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document includes an identical requirement to PEFC ST 1002:2018.</p>
c) keeping documented information to the extent necessary to have confidence that the processes have been carried out as planned.	YES	<p>UA SFM ST 03, 8.2: "The group entity shall plan, implement and control as follows:</p> <p>c) keep documented information to the extent necessary to have confidence that the processes have been carried out as planned."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document includes an identical requirement to PEFC ST 1002:2018.</p>
9. Performance evaluation		
9.1 Monitoring, measurement, analysis and evaluation		
9.1.1 The standard requires that an ongoing internal monitoring programme provides confidence in the conformity of the group organisation with the sustainable forest management standard. In particular, it shall be determined:		
a) what shall be monitored and measured;	YES	<p>UA SFM ST 03, 9.1.1: "The group entity shall develop an internal monitoring programme that would ensure confidence in compliance of the group forest management organisation with the sustainable forest management standard. In particular, this programme shall define:</p> <p>a) what shall be monitored and measured;"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document includes an identical requirement to PEFC ST 1002:2018.</p>
b) the methods for monitoring, measurement, analysis and evaluation, as applicable, to ensure valid results;	YES	<p>UA SFM ST 03, 9.1.1: "The group entity shall develop an internal monitoring programme that would ensure confidence in compliance of the group forest management organisation with the sustainable forest management standard. In particular, this programme shall define:</p> <p>b) the methods for monitoring, measurement, analysis and evaluation, as applicable, to ensure valid results;"</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Compliance: Conformity Justification: The document includes an identical requirement to PEFC ST 1002:2018.
c) when the monitoring and measuring shall be performed;	YES	UA SFM ST 03, 9.1.1: "The group entity shall develop an internal monitoring programme that would ensure confidence in compliance of the group forest management organisation with the sustainable forest management standard. In particular, this programme shall define: c) when the monitoring and measuring shall be performed;" Compliance: Conformity Justification: The document includes an identical requirement to PEFC ST 1002:2018.
d) when the results from monitoring and measurement shall be analysed and evaluated;	YES	UA SFM ST 03, 9.1.1: "The group entity shall develop an internal monitoring programme that would ensure confidence in compliance of the group forest management organisation with the sustainable forest management standard. In particular, this programme shall define: d) when the results from monitoring and measurement shall be analysed and evaluated;" Compliance: Conformity Justification: The document includes an identical requirement to PEFC ST 1002:2018.
e) what documented information shall be available as evidence of the results.	YES	UA SFM ST 03, 9.1.1: "The group entity shall develop an internal monitoring programme that would ensure confidence in compliance of the group forest management organisation with the sustainable forest management standard. In particular, this programme shall define: e) what documented information shall be available as evidence of the results." Compliance: Conformity Justification: The document includes an identical requirement to PEFC ST 1002:2018.
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	UA SFM ST 03, 9.1.2: "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." Compliance: Conformity Justification: The document includes an identical requirement to PEFC ST 1002:2018.

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
9.2 Internal audit		
9.2.1 Objectives		
9.2.1.1 The standard requires that an annual internal audit programme shall provide information on whether the group management system:		
a) conforms to i. the group organisation's own requirements for its group management system; ii. the requirements of the national group certification standard;	YES	UA SFM ST 03, 9.2.1.1: "The group entity shall develop an annual internal audit programme, which shall include 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 this standard;" Compliance: Conformity Justification: The document includes an identical requirement to PEFC ST 1002:2018.
b) ensures the implementation of the sustainable forest management standard on the participant level;	YES	UA SFM ST 03, 9.2.1.1: "The group entity shall develop an annual internal audit programme, which shall include information on whether the group management system: b) ensures the implementation of the sustainable forest management standard on the participant level;" Compliance: Conformity Justification: The document includes an identical requirement to PEFC ST 1002:2018.
c) is effectively implemented and maintained.	YES	UA SFM ST 03, 9.2.1.1: "The group entity shall develop an annual internal audit programme, which shall include information on whether the group management system: c) is effectively implemented and maintained." Compliance: Conformity Justification: The document includes an identical requirement to PEFC ST 1002:2018.
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	UA SFM ST 03, 9.2.1.2: "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." Compliance: Conformity Justification: The document includes an identical requirement to PEFC ST 1002:2018.
9.2.2 Organisation		
The standard requires an internal audit programme which shall cover at least:		
a) planning, establishing, implementing and maintaining an audit programme(s) including the frequency, methods,	YES	UA SFM ST 03, 9.2.2.1: "The group entity shall include the following in the internal audit programme:

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
responsibilities, planning requirements and reporting, which shall take into consideration the importance of the processes concerned and the results of previous audits;		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;" Compliance: Conformity Justification: The document includes an identical requirement to PEFC ST 1002:2018.
b) definition of the audit criteria and scope for each audit;	YES	UA SFM ST 03, 9.2.2.1: "The group entity shall include the following in the internal audit programme: b) definition of the audit criteria and scope for each audit;" Compliance: Conformity Justification: The document includes an identical requirement to PEFC ST 1002:2018.
c) competence of internal auditor (forest knowledge, standard knowledge);	YES	UA SFM ST 03, 9.2.2: "The group entity shall include the following in the internal audit programme: c) competence of internal auditor (forest knowledge, standard knowledge);" Compliance: Conformity Justification: The document includes an identical requirement to PEFC ST 1002:2018.
d) selection of auditors and conducting of audits to ensure objectivity and the impartiality of the audit process;	YES	UA SFM ST 03, 9.2.2: "The group entity shall include the following in the internal audit programme: d) selection of auditors and conducting of audits to ensure objectivity and the impartiality of the audit process;" Compliance: Conformity Justification: The document includes an identical requirement to PEFC ST 1002:2018.
e) ensuring that the results of the audits are reported to relevant group management;	YES	UA SFM ST 03, 9.2.2: "The group entity shall include the following in the internal audit programme: e) ensuring that the results of the audits are reported to relevant group management;" Compliance: Conformity Justification: The document includes an identical requirement to PEFC ST 1002:2018.
f) retaining of the documented information as evidence of the implementation of the audit programme and the audit results.	YES	UA SFM ST 03, 9.2.2: "The group entity shall include the following in the internal audit programme: f) retaining of the documented information as evidence of the implementation of the audit programme and the audit results."

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Compliance: Conformity Justification: The document includes an identical requirement to PEFC ST 1002:2018.
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	UA SFM ST 03, 9.3.1.1: "The participants in the internal audit programme shall be selected based on the requirements which include the following procedures:" a) determination of the sample size (9.3.2); Compliance: Conformity Justification: The document includes an identical requirement to PEFC ST 1002:2018.
b) determination of sample categories(9.3.3);	YES	UA SFM ST 03, 9.3.1.1: "The participants in the internal audit programme shall be selected based on the requirements which include the following procedures:" b) determination of sample categories (9.3.3); Compliance: Conformity Justification: The document includes an identical requirement to PEFC ST 1002:2018.
c) distribution of the sample to the categories (9.3.4);	YES	UA SFM ST 03, 9.3.1.1: "The participants in the internal audit programme shall be selected based on the requirements which include the following procedures:" c) distribution of the sample to the categories (9.3.4); Compliance: Conformity Justification: The document includes an identical requirement to PEFC ST 1002:2018.
d) selection of the participants (9.3.5).	YES	UA SFM ST 03, 9.3.1.1: "The participants in the internal audit programme shall be selected based on the requirements which include the following procedures:" d) selection of the participants (9.3.5);" Compliance: Conformity Justification: The document includes an identical requirement to PEFC ST 1002:2018.
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. UA SFM ST 03 does not define additional element for sampling of participants

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
9.3.1.3 The standard shall define additional sampling requirements in case of participation of pre-existing organisations or group or the members participation, such as a forest owners'/managers' association, SFM programme and submission to tax programming which have their own members.	YES	<p>UA SFM ST 03, 9.3.2.4: "In case of group forest certification with the participants who had joint membership in pre-existing organisations corresponding to the group organisation types specified in clause 4.1.3 (b, c) of this standard, the sample size during the first internal audit may be reduced by a factor of 0.8: ($y = 0,8 \sqrt{x}$) rounded to an integer. For the next internal audits, if the results of internal audits or previous audits of certification bodies have not revealed any major nonconformities, the sample size may be further reduced by a factor of 0.6: ($y = 0,6 \sqrt{x}$), rounded to an integer".</p> <p>UA SFM ST 03, 9.3.1.1: "The participants in the internal audit programme shall be selected based on the requirements which include the following procedures:"</p> <p>e) if necessary, additional sampling requirements are specified in case of group forest certification with participants who had joint membership in pre-existing organisations or groups, such as forest owners/forest users associations; subordination in the territory of the relevant administrative division to the territorial body that implements the state policy in the field of forestry and hunting; parent (main) enterprise and subsidiaries; sustainable forest management programme; tax offices (9.3.2.4);</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document defines a reduction coefficient 0.8 to be used for participants that are participating through a "pre-existing organisation" (9.3.2.4).</p> <p>Chapter 9.3.1.1 indicates that this reduction is not mandatory but is applied "if necessary", i.e., it is at the discretion of the group entity to decide on such a reduction.</p>
9.3.2 Determination of the sample size		
9.3.2.1 The sample size shall be calculated for the participants of the group organisation.	YES	<p>UA SFM ST 03, 9.3.2.1: "The sample size shall be calculated for the participants of the group organisation."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document includes an identical requirement to PEFC ST 1002:2018.</p>
9.3.2.2 The size of the sample generally should be the square root of the number of participants: ($y = \sqrt{x}$), rounded to the upper whole number.	YES	<p>UA SFM ST 03, 9.3.2.2: "The sample size during the first internal audit shall be the square root of the number of participants: ($y = \sqrt{x}$), rounded to an integer."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document includes an identical requirement to PEFC ST 1002:2018.</p>
9.3.2.3 The size of the sample may be adapted by a standard taking into account one or more of the following indicators:		

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
a) results of a risk assessment. In this case deviations of sample sizes in case of low or high risk for individual categories shall be defined;	N/A	<p>Compliance: Not applicable (not mandatory requirement)</p> <p>Justification:</p> <p>The document does not apply all options provided by PEFC ST 1002:2018 and only applies bullet point b of PEFC ST 1002:2018, 9.3.2.3.</p>
b) results of internal audits or previous certification audits;	YES	<p>UA SFM ST 03, 9.3.2.2: "If the results of internal audits or previous audits of certification bodies have not revealed any major nonconformities, the sample size may be further reduced by a factor of 0.8 : ($y = 0,8 \sqrt{x}$), rounded to an integer.</p> <p>Note: Assessment criteria of the participants' compliance with the requirements of UA SFM ST 02 Sustainable Forest Management. Requirements are given in Appendix A."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document allows reduction of the sample by a factor of 0.8 in case of absence of major non-conformities.</p>
c) quality / level of confidence of the internal monitoring programme;	N/A	<p>Compliance: Not applicable (not mandatory requirement)</p> <p>Justification:</p> <p>The document does not apply all options provided by PEFC ST 1002:2018 and only applies bullet point b of PEFC ST 1002:2018, 9.3.2.3.</p>
d) use of technologies allowing the gathering of information concerning specified requirements; Note: Such technologies may be e.g., the use of satellite data or drones and allow compliance statements for specific requirements of a sustainability standard or support the risk based sampling.	N/A	<p>Compliance: Not applicable (not mandatory requirement)</p> <p>Justification:</p> <p>The document does not apply all options provided by PEFC ST 1002:2018 and only applies bullet point b of PEFC ST 1002:2018, 9.3.2.3.</p>
e) based on other means of gathering information about activities on the ground. Note: One way could be a survey with participants who provide some information about their activities on the ground.	N/A	<p>Compliance: Not applicable (not mandatory requirement)</p> <p>Justification:</p> <p>The document does not apply all options provided by PEFC ST 1002:2018 and only applies bullet point b of PEFC ST 1002:2018, 9.3.2.3.</p>
9.3.3 Determination of sample categories		
9.3.3.1 The sample categories shall be established based on the results of a risk assessment. The indicators used in the risk assessment shall reflect the geographical scope of the standard. The following non exhaustive list of indicators may be used for the risk assessment:		
a) ownership type (e.g. state forest, communal forest, private forest);	YES	<p>UA SFM ST 03, 9.3.3.1: "In order to cover the participants by sampling depending on the risk level, the group entity shall categorize them based on the results of risk assessment (Appendix B)".</p> <p>Risk criterion in Annex B: "form of incorporation".</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Compliance: Conformity Justification: A multicriterial risk assessment methodology is described in Appendix B of the group certification standard. It requires to evaluate a risk for each participant based on predefined criteria and appoint a numerical score (0-low risk, 1-medium, 2-low) for each criterion. The total risk score for each participant is then calculated as a sum of risk scores for each criterion. Three sample categories are then defined in 9.3.4.1 based on a total risk score: 1-5 = low risk category, 5-10 medium risk category, 15+ high risk category.
b) size of management units (different size classes);	NO	Compliance: No mandatory requirement
c) biogeographic region (e.g. lowlands, low mountain range, high mountain range);	YES	UA SFM ST 03, 9.3.3.1: "In order to cover the participants by sampling depending on the risk level, the group entity shall categorize them based on the results of risk assessment (Appendix B)". Risk criterion in Annex B: "biogeographic region". Compliance: Conformity Justification: See justification for 9.3.3.1 a
d) operations, processes and products of potential group participants;	YES	UA SFM ST 03, 9.3.3.1: "In order to cover the participants by sampling depending on the risk level, the group entity shall categorize them based on the results of risk assessment (Appendix B)". Risk criterion in Annex B: "Electronic register of timber on all stages of manufacturing process" and "Work performed in the forest by". Compliance: Conformity Justification: See justification for 9.3.3.1 a
e) deforestation and forest conversion;	YES	UA SFM ST 03, 9.3.3.1: "In order to cover the participants by sampling depending on the risk level, the group entity shall categorize them based on the results of risk assessment (Appendix B)". Risk criterion in Annex B: "Forest conversion". Compliance: Conformity Justification: See justification for 9.3.3.1 a
f) rotation period(s);	NO	Compliance: No mandatory requirement
g) richness of biological diversity;	YES	UA SFM ST 03, 9.3.3.1: "In order to cover the participants by sampling depending on the risk level, the group entity shall categorize them based on the results of risk assessment (Appendix B)". Risk criterion in Annex B: "Biological diversity". Compliance: Conformity

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Justification: See justification for 9.3.3.1 a
h) recreation and other socio-economic functions of the forest;	YES	UA SFM ST 03, 9.3.3.1: "In order to cover the participants by sampling depending on the risk level, the group entity shall categorize them based on the results of risk assessment (Appendix B)". Risk criterion in Annex B: "Socio-economic functions of the forest". Compliance: Conformity Justification: See justification for 9.3.3.1 a
i) dependence of and interaction with local communities and indigenous people;	YES	UA SFM ST 03, 9.3.3.1: "In order to cover the participants by sampling depending on the risk level, the group entity shall categorize them based on the results of risk assessment (Appendix B)". Risk criterion in Annex B: "Interaction with local communities". Compliance: Conformity Justification: See justification for 9.3.3.1 a
j) available resources for administration, operations, training and research;	YES	UA SFM ST 03, 9.3.3.1: "In order to cover the participants by sampling depending on the risk level, the group entity shall categorize them based on the results of risk assessment (Appendix B)". Risk criterion in Annex B: "Resources for administration, operations, training and research". Compliance: Conformity Justification: See justification for 9.3.3.1 a
k) governance and law enforcement.	YES	UA SFM ST 03, 9.3.3.1: "In order to cover the participants by sampling depending on the risk level, the group entity shall categorize them based on the results of risk assessment (Appendix B)". Risk criterion in Annex B: "Resources for administration, operations, training and research". Compliance: Conformity Justification: See justification for 9.3.3.1 a
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	UA SFM ST 03, 9.3.3.2: "For each indicator item, a point is given to the participants: 0 (low risk); 1 (medium risk) to 2 (high risk)". Compliance: Conformity Justification: The risk is classified on the scale from 0 to 2. Three sample categories are then defined in 9.3.4.1 based on a total risk score achieved: 1-5 = low risk category, 5-10 medium risk category, 15+ high risk category.

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
<p>9.3.4 Distribution of the sample</p> <p>The sample shall be distributed to the categories according to the result of the risk assessment.</p>	YES	<p>UA SFM ST 03, 9.3.4.1: "Based on the total points of the participants according to clause 9.3.3 the participants are categorized into:</p> <p>1-5 – low risk category;</p> <p>5-15 - medium risk category;</p> <p>15 and more - high risk category".</p> <p>UA SFM ST 03, 9.3.4.1: "Depending on categorizing specified in clause 9.3.4.1, the participants of the annual internal audit shall be selected."</p> <p>UA SFM ST 03, 9.3.5.3: "If the participants are represented by all three categories:</p> <p>– 10% are participants in the low risk category;</p> <p>– 25% are participants in the medium risk category;</p> <p>– 40% are participants in the high risk category".</p> <p>UA SFM ST 03, 9.3.5.4: "If participants are represented by two risk categories:</p> <p>– 25% are participants in the lower risk category;</p> <p>– 50% are participants in the higher risk category".</p> <p>UA SFM ST 03, 9.3.5.5: "If all participants fall into the same risk category, the entire sample shall be random".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>Based on the total risk score, participants are classified into one of three sample categories. The document then defines percentages from the total size of the sample to be included in each of the sampling category (9.3.5.3-9.3.5.5).</p>
9.3.5 Selection of the participants		
<p>9.3.5.1 At least 25% of the sample should be selected at random.</p>	YES	<p>UA SFM ST 03, 9.3.5.1: "At least 25% of the sample shall be selected randomly."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document defines a requirement identical to PEFC ST 1002:2018.</p>
<p>9.3.5.2 A risk-based procedure for the selection of the participants shall be specified.</p>	YES	<p>UA SFM ST 03, 9.3.5.3: "If the participants are represented by all three categories:</p> <p>– 10% are participants in the low risk category;</p> <p>– 25% are participants in the medium risk category;</p> <p>– 40% are participants in the high risk category".</p> <p>UA SFM ST 03, 9.3.5.4: "If participants are represented by two risk categories:</p> <p>– 25% are participants in the lower risk category;</p> <p>– 50% are participants in the higher risk category".</p> <p>UA SFM ST 03, 9.3.5.5: "If all participants fall into the same risk category, the entire sample shall be random".</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>UA SFM ST 03, 9.3.5.6: "The sample for the annual internal audit shall not include participants who had internal audit or audit of the certification body in the previous one/three years, if possible, based on the calculation formula.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document evaluates a risk for each participant and uses the total score for both determining the share of the category on the total size of the sample as well as selection of participants for sampling. defines a requirement identical to PEFC ST 1002:2018.</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>UA SFM ST 03, 9.4.1: "The group entity shall conduct annual management review which shall include at least:</p> <p>a) status of actions from previous management reviews;".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document defines a requirement identical to PEFC ST 1002:2018.</p>
b) changes in external and internal issues that are relevant to the group management system;	YES	<p>UA SFM ST 03, 9.4.1: "The group entity shall conduct annual management review which shall include at least:</p> <p>b) changes in external and internal issues related to the group management system;".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document defines a requirement identical to PEFC ST 1002:2018.</p>
c) the status of conformity with the sustainable forest management standard, that includes reviewing the results of the internal monitoring programme, the internal audit and the certification body's evaluations and surveillance;	YES	<p>UA SFM ST 03, 9.4.1: "The group entity shall conduct annual management review which shall include at least:</p> <p>c) status of compliance with the sustainable forest management standard, which includes review of the internal monitoring programme results, internal audit, assessment and observation of the certification body;".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document defines a requirement identical to PEFC ST 1002:2018.</p>
<p>d) information on the group performance, including trends in:</p> <p>i. nonconformities and corrective actions;</p> <p>ii. monitoring and measurement results;</p> <p>iii. audit results;</p>	YES	<p>UA SFM ST 03, 9.4.1: "The group entity shall conduct annual management review which shall include at least:</p> <p>d) information on the group activities, including trends in:</p> <p>i. nonconformities and corrective actions;</p> <p>ii. monitoring and measurement results;</p> <p>iii. audit findings;".</p> <p>Compliance: Conformity</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Justification: The document defines a requirement identical to PEFC ST 1002:2018.
e) opportunities for continual improvement.	YES	UA SFM ST 03, 9.4.1: "The group entity shall conduct annual management review which shall include at least: e) opportunities for continual improvement". Compliance: Conformity Justification: The document defines a requirement identical to PEFC ST 1002:2018.
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	UA SFM ST 03, 9.4.2: "The results of the management review shall include decisions related to opportunities for continual improvement and any requirements for changes in the group management system." Compliance: Conformity Justification: The document defines a requirement identical to PEFC ST 1002:2018.
9.4.3 The standard requires that the group organisation shall retain documented information as evidence of the results of management reviews.	YES	UA SFM ST 03, 9.4.3: "The group forest management organisation shall keep documented information as evidence of the results of management reviews". Compliance: Conformity Justification: The document defines a requirement identical to PEFC ST 1002:2018.
10. Improvement		
10.1 Nonconformity and corrective action		
10.1.1 The standard requires when a nonconformity occurs, the group organisation shall:		
a) react to the nonconformity and, as applicable: i. take action to control and correct it; ii. deal with the consequences;	YES	UA SFM ST 03, 10.1.1: "In case of non-compliance, 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;" Compliance: Conformity Justification: The document defines a requirement identical to PEFC ST 1002:2018.
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;	YES	UA SFM ST 03, 10.1.1: "In case of non-compliance, the group organisation shall: evaluate the need for action to eliminate the causes of the nonconformity, in order that it does not recur or occur elsewhere, by: i. reviewing the nonconformity; ii. determining the causes of the nonconformity;

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
iii. determining if similar nonconformities exist, or could potentially occur;		<p>iii. determining if similar nonconformities exist, or could potentially occur;".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document defines a requirement identical to PEFC ST 1002:2018.</p>
c) implement any action needed;	YES	<p>UA SFM ST 03, 10.1.1: "In case of non-compliance, the group organisation shall:</p> <p>c) implement any action needed;".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document defines a requirement identical to PEFC ST 1002:2018.</p>
d) review the effectiveness of any corrective action taken;	YES	<p>UA SFM ST 03, 10.1.1: "In case of non-compliance, the group organisation shall:</p> <p>d) review the effectiveness of any corrective action taken;".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document defines a requirement identical to PEFC ST 1002:2018.</p>
e) make changes to the group management system, if necessary.	YES	<p>UA SFM ST 03, 10.1.1: "In case of non-compliance, the group organisation shall:</p> <p>e) make changes to the group management system, if necessary".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document defines a requirement identical to PEFC ST 1002:2018.</p>
10.1.2 The standard requires that the group organisation shall retain documented information as evidence of:		
a) the nature of the nonconformities and any subsequent actions taken;	YES	<p>UA SFM ST 03, 10.1.2: "The group 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 defines a requirement identical to PEFC ST 1002:2018.</p>
b) the results of any corrective action.	YES	<p>UA SFM ST 03, 10.1.2: "The group 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 document defines a requirement identical to PEFC ST 1002:2018.
10.1.3 The standard requires that a participant who was excluded from a group certification shall be internally audited by the group entity before it is allowed to re-enter the group certification. The internal audit shall not take place sooner than 12 months after the exclusion.	YES	<p>UA SFM ST 03, 10.1.3: "A participant who was excluded from a group certification shall be internally audited by the group entity before it is allowed to re-enter the group certification. The internal audit shall not take place sooner than 12 months after the exclusion".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document defines a requirement identical to PEFC ST 1002:2018.</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>UA SFM ST 03, 10. 2: "The group entity and participants shall continuously improve the suitability, adequacy and effectiveness of the group management system and the sustainable management.".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document defines a requirement identical to PEFC ST 1002:2018.</p>

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:		
<p>a) include management and performance requirements that are applicable at the forest management unit level, or at another level as appropriate, to ensure that the intent of all requirements is achieved at the forest management unit level;</p> <p>Note: An example of a situation where a requirement can be defined as being at another level (e.g. group/regional) is monitoring of forest health. Through monitoring of forest health at regional level, and communicating of results at the FMU level, the objective of the requirement is met without the necessity to carry out the individual monitoring of each forest management unit.</p>	YES	<p>UA SFM ST 02, 4.1.1: "The general requirements for sustainable forest management defined in this standard relate to:</p> <p>a) management and performance requirements that are applicable at the forest management unit level, or at another level as appropriate, to ensure that the intent of all requirements is achieved at the forest management unit level;..."</p> <p>The standard includes requirements for the FMU level, both management system (planning, monitoring, etc.) as well as performance-based requirements with specific indicators for forest operations.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard includes requirements for FMU level, both management system (planning, monitoring, etc.) as well as performance-based requirements with specific indicators for forest operations.</p>
b) be clear, performance based and auditable;	YES	<p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard includes requirements that are clear, performance/based and auditable.</p> <p>This was confirmed by this assessment but also results of the pilot tests that were conducted as a part of the standard setting process.</p>
c) apply to activities of all forest operators in the defined forest area who have an impact on achieving compliance with the requirements;	YES	<p>UA SFM ST 02, 4.1.1: "The general requirements for sustainable forest management defined in this standard relate to:</p> <p>b) activities of all entities operating in the defined forest area who have an impact on achieving compliance with the requirements."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard defines that it applies to all entities operating on defined area.</p>
d) require record-keeping that provides evidence of compliance with the requirements of the forest management standards;	YES	<p>UA SFM ST 02, 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 demonstrating the conformity to the standard and for the effectiveness of the sustainable forest management system".</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>UA SFM ST 02, 7.5.2: "The documented information shall be relevant, and updated as appropriate, to the activities of the Organisation".</p> <p>UA SFM ST 02, 7.5.3: "The Organisation shall document at least the following aspects of its activities for the demonstrating the conformity to the standard:</p> <ul style="list-style-type: none"> a) the process of forest management Organisation and planning; b) monitoring of the objects determined by the Organisation; c) the process of communication with stakeholders; d) social aspects, including labor protection issues; e) allocation of ecologically important areas". <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard requires to keep documented information and defines objectives as well as scope of the documented information. This also covers records demonstrating compliance with the standard.</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>UA SFM ST 02, 4.1.2: The using of PEFC claims</p> <p>"a) Forest user / seller, who has PEFC recognised certificate in conformity of this Standard shall use claim "100% PEFC certified", as claim to communicate the origin of products from sustainable forest management to customers with a PEFC chain of custody.</p> <p>Note: Translations into languages other than English of System claim "100% PEFC certified" according to these Standard requirements, are published online on the PEFC website www.pefc.org.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard states that forest owner/manager with PEFC-recognised certificate issued against the Standard shall use PEFC claims "100% PEFC certified".</p>
<p>f) require that where owners/managers of forests are selling products from areas other than covered by the standard, only products from areas covered by the standard are sold with the claim "100% PEFC-certified" or a system specific claim;</p>	YES	<p>UA SFM ST 02, 4.1.2:</p> <p>d) where certificate holder are selling products from areas other than covered by the standard, only products from areas covered by this Standard are sold with the claim "100% PEFC-certified";</p> <p>Note: An example would be the situation when a certificate holder purchases products from non-certified suppliers for processing or resale. In this case, the certificate holder cannot use the claim 100% PEFC certified; when selling this particular product.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires that the PEFC claim "100% PEFC certified" can only be used for material originating in forests covered by the Standard.</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Observation: The Standard (4.1.2c) makes reference to the “system specific claims”. However, the Ukraine system does not define any system specific claims. It is not clear to which claims the Standard refers to.
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	UA SFM ST 02, 4.1.2: “a) only that forest user / seller who has a PEFC-recognized certificate of compliance with the requirements of this Standard, i.e. PEFC-certificate of the forest management system may use PEFC claims; Note: An example would be the situation when the certificate holder products are sold by non-certified enterprise. In this case, this non-certified enterprise cannot claim that these products are 100% PEFC certified.” Compliance: Conformity Justification: The Standard requires that only forest owner with PEFC recognised certificate issued against the Standard can use the PEFC claim.
h) specify requirements concerning the information which need to be provided to a PEFC chain of custody certified customer;	YES	UA SFM ST 02, 4.1.3. Handling of PEFC certified product: “c) during the sale of products as PEFC-certified, the Organisation shall at least indicate in its shipping or sales documents the following information: - name and contact details of the Organisation; - information for customer identification - the client’s name (USREOU code), except for sales to end users; - date of the document issue; - trade name of the product; - number of products sold; - PEFC certificate code of the Organisation; - PEFC claim.” Compliance: Conformity Justification: The Standard requires to provide in the sales documents information as required by PEFC ST 2002:2020.
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	UA SFM ST 02 does not make an overview of applicable legislation. However, it makes for some requirements reference to specific national legislation.
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	UA SFM ST 02, 2 (Definitions) “3.1 Affected stakeholder: A stakeholder who might experience a direct change in living and / or working

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>conditions caused by implementation of a standard, or a stakeholder who might be a user of a standard and therefore is subject to the requirements of the standard".</p> <p>UA SFM ST 02, 4.2: "The Organisation shall determine: a) the affected stakeholders that are relevant to the sustainable forest management of the Organisation,..."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires to identify affected stakeholders.</p>
b) the relevant needs and expectations of these stakeholders.	YES	<p>UA SFM ST 02, 4.2: "The Organisation shall determine: 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 affected stakeholders.</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>UA SFM ST 02, 4.3.1: "The organisation shall determine the boundaries and applicability of the management system to establish its scope".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires to identify boundaries and scope of the management system.</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>UA SFM ST 02, 4.3.2: "The 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."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes a requirement that is identical to the PEFC requirement.</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>UA SFM ST 02, 5.1: "The organisation shall provide a commitment: a) to comply with the sustainable forest management standard and other applicable requirements of the certification system..."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes a requirement that is identical to the PEFC requirement.</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
b) to continuously improve the sustainable forest management system.	YES	<p>UA SFM ST 02, 5.1: "The organisation shall provide a commitment b) to continuously improve the sustainable forest management system,"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes a requirement that is identical to the PEFC requirement.</p>
5.2 The standard requires that this commitment shall be publicly available.	YES	<p>UA SFM ST 02, 5.2: "Such commitment shall be made freely available to all stakeholders, at least on the Organisation's website and / or the Organisation's official social network page, and optionally in other media."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires publicly available commitment.</p>
5.3 The standard requires that responsibilities for sustainable forest management shall be clearly defined and assigned.	YES	<p>UA SFM ST 02, 5.3: "The responsibilities for sustainable forest management shall be clearly defined and assigned."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires to identify responsibilities for SFM.</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>UA SFM ST 02, 6.1.1: "The Organisation shall consider risks and opportunities concerning compliance with the requirements for sustainable forest management:</p> <p>a) external factors, in particular economic, socio-cultural, technological, institutional, natural and environmental;</p> <p>b) internal factors, in particular scientific and technical, financial and economic, personnel and natural resources".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires to identify risk and opportunities.</p>
6.1.2 The standard requires that inventory and mapping of forest resources shall be established and maintained, adequate to local and national conditions and in correspondence with the requirements described in this international benchmark standard.	YES	<p>UA SFM ST 02, 6.1.2: "The assessment of the quantitative and qualitative characteristic and mapping of forest resources shall be carried out and maintained to the extent appropriate to local and national conditions, as well as to the requirements specified in this Standard".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires to conduct inventory and mapping of forest resources.</p>
6.2 Management plan		
6.2.1 The standard requires that management plans shall be:		

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
a) elaborated and periodically updated or continually adjusted;	YES	<p>UA SFM ST 02, 6.2.1: The management plans shall be: a) elaborated and periodically updated or continually adjusted;</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes a requirement that is identical to the PEFC requirement.</p>
b) appropriate to the size and use of the forest area;	YES	<p>UA SFM ST 02, 6.2.1: The management plans shall be: b) appropriate to the size and use of the forest area;</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes a requirement that is identical to the PEFC requirement.</p>
c) based on applicable local, national and international legislation as well as existing land-use or other official plans; and	YES	<p>UA SFM ST 02, 6.2.1: The management plans shall be: c) based on applicable legislation as well as existing land-use or other official plans;</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes a requirement that is identical to the PEFC requirement.</p>
d) adequately covering forest resources.	YES	<p>UA SFM ST 02, 6.2.1: The management plans shall be: d) adequately covering all kinds of forest resources;"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes a requirement that is identical to the PEFC requirement.</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>UA SFM ST 02, 6.2.2: "The management plans shall take into account the different uses and functions of the managed forest area."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes a requirement that is identical to the PEFC requirement.</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>UA SFM ST 02, 6.2.3: "The 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."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes a requirement that is identical to the PEFC requirement.</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	YES	<p>UA SFM ST 02, 6.2.4: "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."</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
management covers commercial use of non-wood forest products at a level which can have an impact on their long-term sustainability.		Compliance: Conformity Justification: The Standard includes a requirement for allowable use of non-wood forest products.
6.2.5 The standard requires that management plans specify ways and means to minimise the risk of degradation and damage to forest ecosystems.	YES	UA SFM ST 02, 6.2.5: "The management plans specify ways and means to minimise the risk of degradation and damage to forest ecosystems." Compliance: Conformity Justification: The Standard includes a requirement that is identical to the PEFC requirement.
6.2.6 The standard requires that management plans shall take into account the results of scientific research.	YES	UA SFM ST 02, 6.2.6: "The management plans shall take into account the results of scientific research." Compliance: Conformity Justification: The Standard includes a requirement that is identical to the PEFC requirement.
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	UA SFM ST 02, 6.2.7: "The 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." Note: 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." Compliance: Conformity Justification: The Standard includes a requirement that is for public availability of forest management plans.
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	UA SFM ST 02, 6.2.7: "The 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." Note: 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." Compliance: Conformity Justification: The Standard includes possibility to exclude for public summary of forest management plans confidential and sensitive natural resources information.
6.3 Compliance requirements		

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
6.3.1 Legal compliance		
<p>6.3.1.1 The standard requires that the organisation shall identify and have access to the legislation applicable to its forest management and determine how these compliance obligations apply to the organisation.</p> <p>Note: For a country which has signed a FLEGT Voluntary Partnership Agreement (VPA) between the European Union and the producing country, the "legislation applicable to forest management" is defined by the VPA agreement.</p>	YES	<p>UA SFM ST 02, 6.3.1.1 "The Organisation shall identify and have access to the legislation applicable to its forest management and determine how these compliance obligations apply to the Organisation."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes a requirement that is identical to the PEFC requirement.</p>
<p>6.3.1.2 The standard requires that the organisation shall comply with applicable local, national and international legislation on forest management, including but not limited to forest management practices; nature and environmental protection; protected and endangered species; property, tenure and land-use rights for indigenous peoples, local communities or other affected stakeholders; health, labour and safety issues; anti-corruption and the payment of applicable royalties and taxes.</p>	YES	<p>UA SFM ST 02, 6.3.1.2 "The Organisation shall comply with the requirements of current legislation on management issues, taking into account local (regional) conditions, including to:</p> <ul style="list-style-type: none"> 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 applicable royalties and taxes." <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes a requirement that is identical to the PEFC requirement.</p>
<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.</p>	YES	<p>UA SFM ST 02, 6.3.1.3: "The organisation shall develop measures to reduce the corruption risk in accordance with anti-corruption legislation."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes a requirement that is identical to the PEFC requirement.</p>
<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.</p>	YES	<p>UA SFM ST 02, 6.3.1.4: "The 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."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires anti-corruption measures to be implemented in compliance with the anti-corruption legislation.</p>
6.3.2 Legal, customary and traditional rights related to the forest land		

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
<p>6.3.2.1 The standard requires that property rights, tree ownership and land tenure arrangements shall be clearly defined, documented and established for the relevant management unit. Likewise, legal, customary and traditional rights related to the forest land shall be clarified, recognised and respected.</p> <p>Note: Guidance for the handling of tenure arrangements can be obtained from the FAO Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security.</p>	YES	<p>UA SFM ST 02, 6.3.2.1: "Property rights, land ownership and forest use rights shall be clearly defined, documented and established for the relevant forest management unit. Likewise, legal rights related to the forest land shall be clarified, recognised and respected."</p> <p>UA SFM ST 02, 6.3.2.2: "The forest practices and operations shall be conducted in recognition of the established framework of legal rights. 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 national policies and laws."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes a requirement for legal rights, property and forest use rights.</p>
<p>6.3.2.2 The standard requires that forest practices and operations shall be conducted in recognition of the established framework of legal, customary and traditional rights such as outlined in ILO 169 and the UN Declaration on the Rights of Indigenous Peoples, which shall not be infringed upon without the free, prior and informed consent of the holders of the rights, including the provision of compensation where applicable. Where the extent of rights is not yet resolved, or is in dispute, there are processes for just and fair resolution. In such cases forest managers shall, in the interim, provide meaningful opportunities for parties to be engaged in forest management decisions whilst respecting the processes and roles and responsibilities laid out in the policies and laws where the certification takes place.</p>	N/A	<p>Not applicable as there are no indigenous people in Ukraine.</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>UA SFM ST 02, 6.3.2.3: "The forest practices and operations shall respect human rights as defined by the Universal Declaration on Human Rights."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes a requirement that is identical to the PEFC requirement.</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</p>	YES	<p>UA SFM ST 02, 6.3.3.1: "The forest practices and operations shall comply with fundamental ILO conventions".</p> <p>Compliance: Conformity</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
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.		Justification: The Standard includes a requirement that is identical to the PEFC requirement. Annex A to the Standard includes ratification dates for all eight (8) fundamental ILO Conventions.
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	UA SFM ST 02, 6.3.4.4.1: "The organization shall provide the appropriate occupational health and safety management system for all employees engaged by the Organization to perform the work, including service providers (contractors)". UA SFM ST 02, 6.3.4.4.2: "Forest management activities shall be planned, organized and implemented in such way as to identify risks to health hazards and occupational injuries". UA SFM ST 02, 6.3.4.4.3: "The organization shall take all necessary measures to ensure the safe working conditions for employees". UA SFM ST 02, 6.3.4.4.4: "Employees shall be informed about the risks associated with their work and about measures to avoid such risks". Compliance: Conformity Justification:
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	UA SFM ST 02, 6.3.4.4.1: "The organization shall provide the appropriate occupational health and safety management system for all employees engaged by the Organization to perform the work, including service providers (contractors)". UA SFM ST 02, 6.3.4.4.3: "The organization shall take all necessary measures to ensure the safe working conditions for employees". UA SFM ST 02, 6.3.4.2.1: "The organization shall provide training and briefings on health and safety for all personnel involved in forestry operations". UA SFM ST 02, 6.3.4.2.2: "The organization shall provide the adequate control of the compliance on health and safety for all personnel involved in forestry operations". UA SFM ST 02, 6.3.4.2.3: "Organizations should study the capacity and oblige service providers (contractors) to adhere occupational safety and health during the performing of forestry work". Compliance: Conformity Justification: The Standard requires safe working conditions, health and safety relating training as well as controls. The Standard also requires service provides obligations relating to the health and safety.
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	YES	UA SFM ST 02, 6.3.4.3.1: "The organization shall comply with the requirements for working hours and vacations in

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
<p>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>		<p>accordance with national law and in accordance with the concluded collective agreements".</p> <p>UA SFM ST 02, 6.3.4.3.2: "Wages for both local workers and migrants, contractors and other workers involved in PEFC-certified areas shall meet at least the statutory branch minimum standards or exceed them (if any) under collective agreements".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for wages to be in compliance with legislation and collective agreements that applies to local, migrant workers and contractors.</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>UA SFM ST 02, 6.3.4.4: "The Organization's employment policy shall provide for equal opportunities and non-discrimination, in particular on the basis of gender identity".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes a requirement for equal opportunities and non-discrimination. and contractors.</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>UA SFM ST 02, 7.1.1: "The organisation shall determine and provide the resources needed for the establishment, implementation, maintenance and continual improvement of the sustainable forest management system".</p> <p>UA SFM ST 02, 7.1.2: "The organization shall consider (take into account):</p> <ul style="list-style-type: none"> a) opportunities and constraints related to its existing internal resources; b) resources that need to be attracted from the outside to achieve the stated objectives." <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for resources, internal as well as external. equal opportunities and non-discrimination. and contractors.</p>
7.2 Competence		
<p>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.</p>	YES	<p>UA SFM ST 02, 7.2.1: "Forest managers, employees, service providers (contractors) 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 Standard."</p> <p>UA SFM ST 02, 7.2.1.1: "The organization shall determine the required level of competence of employees involved in the performance of work under its supervision.</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>UA SFM ST 02, 7.2.1.2: "The organization shall ensure the sufficient level of employees' competence."</p> <p>UA SFM ST 02, 7.2.1.3: "The organization shall provide the opportunities to increase the employees' competence."</p> <p>UA SFM ST 02, 7.2.1.4: "The organization shall bring the employees' competence under control."</p> <p>UA SFM ST 02, 7.2.2: "The organization shall record and keep the appropriate evidence of employees' competence in accordance with the requirements of section 7.5".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirement for competence of employees as well as contractors, including identification of competence needed, control, on-going training, competence maintenance and improvement, and records-keeping.</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>UA SFM ST 02, 7.3.1: "The organization shall provide the effective communication and consultation with and involvement of local communities and other stakeholders relating to sustainable forest management".</p> <p>UA SFM ST 02, 7.3.2: "The approved procedures of the Organization for interaction with stakeholders shall reflect:</p> <ul style="list-style-type: none"> a) issues involving stakeholders; b) stakeholder engagement criteria, including ensuring the appropriate representation of current stakeholders (by age, gender, etc.); c) mechanisms for identifying and coordinating information exchange channels with stakeholders; d) criteria and mechanism for dissemination of information about the consultation results." <p>UA SFM ST 02, 7.3.3: "Stakeholder consultation processes shall be transparent."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for communication and consultation with local communities and other stakeholders. It also includes requirements for stakeholders engagement, identification of issues and communication channels, and transparent stakeholders consultation.</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>UA SFM ST 02, 7.4.1: "The organization shall have the appropriate mechanisms for resolving complaints and disputes relating to forest management operations, land use rights and work conditions."</p> <p>UA SFM ST 02, 7.4.2: "The Organization shall make publicly available the existing mechanisms for resolving complaints and disputes related to forest management,</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		land use rights and work conditions in the state language, and in other languages - at the discretion of the Organization". Compliance: Conformity Justification: The Standard includes requirements for complaints and dispute settlements and public availability of such mechanisms.
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	UA SFM ST 02, 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". Compliance: Conformity Justification: The Standard includes requirements that are identical to the PEFC requirement.
7.5.2 The standard requires that the documented information is relevant, and updated as appropriate, to the activities of the organisation.	YES	UA SFM ST 02, 7.5.2: "The documented information shall be relevant, and updated as appropriate, to the activities of the organisation." UA SFM ST 02, 7.5.3: "The organization shall document at least the following aspects of its activities: a) the process of forest management organization and planning; b) monitoring of the objects determined by the organisation; c) the process of communication with stakeholders; d) social aspects, including labor protection issues; e) allocation of ecologically important areas." Compliance: Conformity Justification: The Standard includes requirements for relevant and updated documented information.
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	UA SFM ST 02, 8.1.1.1: "Sites of clear cuttings shall be timely reforested according to the type of forest site conditions." UA SFM ST 02, 8.1.1.2: "In the general structure of forest areas, the share of areas not covered by forest vegetation shall not increase or such increase shall be justified." UA SFM ST 02, 8.1.1.3: "Forest management activities shall be planned and implemented taking into account

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>forest categories to maximize the values of each category".</p> <p>UA SFM ST 02, 8.1.1.4: "Within the territory of the Organisation and in adjacent territories, forest ecosystem services shall be identified and measures taken to maintain and improve them".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for maintaining forest area and tree vegetation. Forest practices shall respect different forest categories and their functions and forest services shall be maintained and improved.</p>
8.1.2 The standard requires that the quantity and quality of the forest resources and the capacity of the forest to store and sequester carbon shall be safeguarded in the medium and long term by balancing harvesting and growth rates, using appropriate silvicultural measures and preferring techniques that minimise adverse impacts on forest resources.	YES	<p>UA SFM ST 02, 8.1.2: "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 providing harvesting rates and growth rates (except in cases of emergencies related to natural disasters), using appropriate silvicultural measures and preferring techniques that minimize adverse impacts on forest resources".</p> <p>UA SFM ST 02, 8.1.2.1: "Annual allowable cut shall be established in terms of forest types and management sections, taking into account biological and productive maturity of the forest".</p> <p>UA SFM ST 02, 8.1.2.2: "Timber harvesting volumes shall not exceed total average change in stock calculated for the forest inventory period, unless increase in harvesting is due to emergencies related to natural disasters".</p> <p>UA SFM ST 02, 8.1.2.3: "Preference should be given to selective and gradual systems of cutting, taking into account forest vegetation conditions".</p> <p>UA SFM ST 02, 8.1.2.4: "Natural and climatic conditions shall be considered when planning and conducting forest management activities".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for maintaining the quality and quantity of forest resources by defining an annual allowable cut, maintenance of the growing stock, preference to the selective and gradual silvicultural systems and consideration of natural conditions when planning forestry activities.</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>UA SFM ST 02, 8.1.3: "Forest management practices shall encourage green-house gas emission reductions and efficient use of resources".</p> <p>UA SFM ST 02, 8.1.3.1: "When planning of cuttings, which aim harvesting of commercial wood, it is necessary to take into account possibility of its prompt sale for efficient use of resources".</p> <p>UA SFM ST 02, 8.1.3.2: "On all types of cutting appropriate logging technique shall be applied, which provides optimal amount of commercial wood with minimal impact on growing trees and other forest components".</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>UA SFM ST 02, 8.1.3.3: "Burning of logging residues can be carried out only in the cases when their remaining leads to deterioration of sanitary and fire resistance condition of forest, and if there is proper justification for doing this".</p> <p>UA SFM ST 02, 8.1.3.4: "The Organisation shall implement and maintain an effective system of fire prevention measures to prevent and timely eliminate forest fires".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for climate positive practices, including efficient use of resources, minimisation of damages to the growing trees, restriction on burning forest debris and prevention and control of forest fires.</p>
8.1.4 The standard requires that forest conversion shall not occur unless in justified circumstances where the conversion:		
a) is in compliance with national and regional policy and legislation applicable for land use and forest management and is a result of national or regional land-use planning governed by a governmental or other official authority including consultation with affected stakeholders; and	YES	<p>UA SFM ST 02, 8.1.4: " Forest conversion shall not occur within Organization unless in justified circumstances where the conversion:</p> <p>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".</p> <p>UA SFM ST 02, 3.15 defines the term "forest conversion" as "change of designated purpose of forest plots, or replacement of natural and semi natural forests for non-forest lands or forest plantations".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements prohibiting forest conversion. The criterion of "legal compliance and stakeholders consultation is identical with the PEFC requirement.</p> <p>The definition of forest conversion complies with the definition in PEFC ST 1003 as</p> <p>a) All forest land shall not be converted (changed) from the designed functions and</p> <p>b) natural and seminatural forests (means all forests except forest plantations) shall not be converted to non-forest land forest plantations.</p> <p>The term "natural" and "semi-natural" forests are not defined directly in the standard but the concept of "natural forests / semi-natural forests / forest plantations is referenced in the Ukraine legislation^[30] as well as in scientific or other forest related papers ^[31, 32, 33].</p> <p>This concept follows the FAO classification where the Ukraine forests consist of natural forests (primary - 59.000 ha and modified natural - 4.729.000 ha), semi-</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>natural 4.399.000 ha and plantations (productive 81.000 ha and protective 300.000 ha) (see Countries (fao.org)).</p> <p>Also State of Europe's Forests 2020^[34] published by Forest Europe (formerly the MCPFE) uses the classification of "undisturbed by men / semi-natural / plantations".</p> <p>The term "natural forests" is defined in the Ukraine legislation and also covers "primary forests", "quasi-primary forests" and other "natural forests" (see Лісовий кодекс України від 21.01.1994 № 3852-XII (rada.gov.ua)).</p> <p>Observation:</p> <p>Although the term "natural" and "semi-natural" forests are defined in external documents, the relevant definitions should be included directly in the Standard.</p>
b) entails a small proportion (no greater than 5 %) of forest type within the certified area; and	YES	<p>UA SFM ST 02, 8.1.4: " Forest conversion shall not occur within Organization unless in justified circumstances where the conversion:</p> <p>a) b) entails a small proportion (no greater than 5 %) of forest type within the certified area; and..."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements prohibiting forest conversion. The criterion of "small proportion" for justified circumstances is identical with the PEFC requirement.</p>
c) does not have negative impacts on ecologically important forest areas, culturally and socially significant areas, or other protected areas; and	YES	<p>UA SFM ST 02, 8.1.4: "Forest conversion shall not occur within Organization unless in justified circumstances where the conversion:</p> <p>c) does not have negative impacts on ecologically important forest areas, culturally and socially significant areas, or other protected areas; and".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements prohibiting forest conversion. The criterion for justified circumstances of "no negative impact on ecologically, socially and culturally important areas" is identical with the PEFC requirement.</p>
d) does not destroy areas of significantly high carbon stock; and	YES	<p>UA SFM ST 02, 8.1.4: " Forest conversion shall not occur within Organization unless in justified circumstances where the conversion:</p> <p>d) does not destroy areas of significantly high carbon stock; and".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements prohibiting forest conversion. The criterion for justified circumstances of "protection of significantly high carbon stock" is identical with the PEFC requirement.</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
e) makes a contribution to long-term conservation, economic, and social benefits.	YES	<p>UA SFM ST 02, 8.1.4: "Forest conversion shall not occur within Organization unless in justified circumstances where the conversion:</p> <p>e) makes a contribution to long-term conservation, economic, and social benefits."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements prohibiting forest conversion. The criterion for justified circumstances of "conservation, economic and social benefits" is identical with the PEFC requirement.</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>UA SFM ST 02, 8.1.5: "Afforestation of ecologically important non-forest ecosystems shall not occur unless in justified circumstances where the conversion:</p> <p>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"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements that are identical with the PEFC requirement.</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>UA SFM ST 02, 8.1.5: "Afforestation of ecologically important non-forest ecosystems shall not occur unless in justified circumstances where the conversion:</p> <p>b) is established based on a decision-making basis with the involvement of affected stakeholders, in cases where they have the right to influence to the decision-making on conversion through transparent and participatory consultation processes; and"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements that are identical with the PEFC requirement.</p>
c) does not have negative impacts on threatened (including vulnerable, rare or endangered) nonforest ecosystems, culturally and socially significant areas, important habitats of threatened species or other protected areas; and	YES	<p>UA SFM ST 02, 8.1.5: "Afforestation of ecologically important non-forest ecosystems shall not occur unless in justified circumstances where the conversion:</p> <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"</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 that are identical with the PEFC requirement.
d) entails a small proportion of the ecologically important non-forest ecosystem managed by an organisation; and	YES	<p>UA SFM ST 02, 8.1.5: "Afforestation of ecologically important non-forest ecosystems shall not occur unless in justified circumstances where the conversion:</p> <p>d) entails a small proportion of the ecologically important non-forest ecosystem managed by an organisation; and".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements that are identical with the PEFC requirement.</p>
e) does not destroy areas of significantly high carbon stock; and	YES	<p>UA SFM ST 02, 8.1.5: "Afforestation of ecologically important non-forest ecosystems shall not occur unless in justified circumstances where the conversion:</p> <p>e) does not destroy areas of significantly high carbon stock, for example, peatlands; and".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements that are identical with the PEFC requirement.</p>
f) makes a contribution to long-term conservation, economic, and social benefits.	YES	<p>UA SFM ST 02, 8.1.5: "Afforestation of ecologically important non-forest ecosystems shall not occur unless in justified circumstances where the conversion:</p> <p>f) makes a contribution to long-term conservation, economic, and social benefits.".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements that are identical with the PEFC requirement.</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>UA SFM ST 02, 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>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"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements that are identical with the PEFC requirement.</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
b) is established based on a decision-making basis where affected stakeholders have opportunities to contribute to the decision-making on conversion through transparent and participatory consultation processes; and	YES	<p>UA SFM ST 02, 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>b) is established based on a decision-making basis with the involvement of affected stakeholders, in cases where they have the right to influence to the decision-making on conversion through transparent and participatory consultation processes; and"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements that are identical with the PEFC requirement.</p>
c) has a positive impact on long-term carbon sequestration capacity of forest vegetation; and	YES	<p>UA SFM ST 02, 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>c) has a positive impact on long-term carbon sequestration capacity of forest vegetation; and"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements that are identical with the PEFC requirement.</p>
d) does not have negative impacts on ecologically important forest areas, culturally and socially significant areas, or other protected areas; and	YES	<p>UA SFM ST 02, 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>d) does not have negative impacts on ecologically important forest areas, culturally and socially significant areas, or other protected areas; and"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements that are identical with the PEFC requirement.</p>
e) safeguards protective functions of forests for society and other regulating or supporting ecosystem services; and	YES	<p>UA SFM ST 02, 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>e) safeguards protective functions of forests for society and other regulating or supporting ecosystem services; and"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements that are identical with the PEFC requirement.</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
f) safeguards socio-economic functions of forests, including the recreational function and aesthetic values of forests and other cultural services; and	YES	<p>UA SFM ST 02, 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>f) safeguards socio-economic functions of forests, including the recreational function and aesthetic values of forests and other cultural services; and".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements that are identical with the PEFC requirement.</p>
g) has a land history providing evidence that the degradation is not the consequence of deliberate poor forest management practices; and	YES	<p>UA SFM ST 02, 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; and".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements that are identical with the PEFC requirement.</p>
h) is based on credible evidence demonstrating that the area is neither recovered nor in the process of recovery.	YES	<p>UA SFM ST 02, 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) is based on credible evidence demonstrating that the area is neither recovered nor in the process of recovery.".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements that are identical with the PEFC requirement.</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>UA SFM ST 02, 8.2.1: "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.</p> <p>8.2.1.1. Forest management in favorable forest conditions should be aimed at formation of mixed multi-layer stands of different ages.</p> <p>8.2.1.2. Secondary forest stands should be gradually replaced by native forests, taking into account nature and climate changes.</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>8.2.1.3. Degraded forest areas shall be restored to their natural state, which existed until degradation had occurred.</p> <p>8.2.1.4. Measures shall be taken to prevent and control improper hunting, non-timber harvesting and other inappropriate use of natural resources.</p> <p>8.2.1.5. Control over cattle grazing and hay harvesting in legally prescribed forest areas shall be ensured in order to prevent their damage.”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for maintenance and enhancement of forest health and vitality by formation of mixed multilayer stands, promotion of native forests, restoration of degraded forests, control of non-timber harvesting and control of cattle grazing and hay harvesting.</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>UA SFM ST 02, 8.2.1: "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.</p> <p>8.2.1.1. Forest management in favorable forest conditions should be aimed at formation of mixed multi-layer stands of different ages.</p> <p>8.2.1.2. Secondary forest stands should be gradually replaced by native forests, taking into account nature and climate changes.</p> <p>8.2.1.3. Degraded forest areas shall be restored to their natural state, which existed until degradation had occurred.</p> <p>8.2.1.4. Measures shall be taken to prevent and control improper hunting, non-timber harvesting and other inappropriate use of natural resources.</p> <p>8.2.1.5. Control over cattle grazing and hay harvesting in legally prescribed forest areas shall be ensured in order to prevent their damage.”.</p> <p>UA SFM ST 02, 8.2.2: "Planning and implementation of management measures shall encourage or maintain adequate genetic, species and structural diversity to enhance the stability, vitality and resilience of the forests to adverse environment factors and strengthen natural regulation mechanisms”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for maintenance and enhancement of forest health and vitality by formation of mixed multilayer stands, promotion of native forests, restoration of degraded forests, control of non-timber harvesting, control of cattle grazing and hay harvesting and supporting adequate genetic, species and structural diversity.</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
8.2.3 The standard requires that use of fire shall be limited to regions where fire is an essential tool in forest management for regeneration, wildfire protection and habitat management or a recognized practice of indigenous peoples. In these cases adequate management and control measures shall be taken.	YES	<p>UA SFM ST 02, 8.2.3: "Use of fire shall be limited to regions where fire is an essential tool in forest management for wildfire protection and nature maintenance. In these cases adequate management and control measures shall be taken".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements restricting the use of fires in forest management.</p>
8.2.4 The standard requires that appropriate forest management practices such as reforestation and afforestation with tree species and provenances that are suited to the site conditions or the use of tending, harvesting and transport techniques that minimise tree and/or soil damages shall be applied.	YES	<p>UA SFM ST 02, 8.2.4: "According with local nature condition an 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 minimize tree and/or soil damages shall be applied.</p> <p>8.2.4.1. In silvicultural activity measures should be taken to promote natural regeneration of forests with consideration of forest site conditions.</p> <p>8.2.4.2. During artificial reforestation, preference should be given to mixed forest stands with consideration of types of forest site conditions.</p> <p>8.2.4.4. Thinning and final cutting techniques as well as wood transportation methods should be aimed at minimizing damage to trees and shrubs and soil cover.</p> <p>Note: In order to comply with the laws and regulations of Ukraine, in particular «The Rules of Final Timber Harvest», the Resolution of the Cabinet of Ministers «On Approval of the Rules of Final Timber Harvest in the Mountain Forests of the Carpathians» the term «RUBKA» is used in this standard. Its synonym, which also finds a place in the practice of forestry in Ukraine and can be used in the assessment in accordance with this standard, is the term «RUBANNYA»".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>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.</p>
8.2.5 The standard requires that the indiscriminate disposal of waste on forest land shall be strictly avoided. Non-organic waste and litter shall be collected, stored in designated areas and removed in an environmentally-responsible manner. The spillage of oil or fuel during forest management operations shall be prevented. Emergency procedures for the minimisation of risk of environmental harm arising from the accidental spillage shall be in place.	YES	<p>UA SFM ST 02, 8.2.5: "The Organisation shall strictly avoid indiscriminate disposal of waste on forest land. 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 minimization of risk of environmental harm arising from the accidental spillage shall be in place.</p> <p>8.2.5.1. Use of forest lands for establishing legal landfills is not allowed without prior approved change of their management purpose.</p> <p>8.2.5.2. Precautions shall be taken to prevent forest littering.</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>8.2.5.3. Garbage and inorganic waste collection facilities shall be available at the forest sites.</p> <p>8.2.5.4. Inorganic waste shall be disposed of in an environmentally sound manner or recycled if possible.</p> <p>8.2.5.5. Absorbents shall be provided at each operational site to prevent fuels and oils spillage into soil and/or water bodies and operators shall be adequately trained in their use."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for disposal of waste, waste management, and for avoidance of spillage of oil or fuel.</p>
8.2.6 The standard requires that integrated pest management, appropriate silviculture alternatives and other biological measures shall be preferred to minimise the use of pesticides.	YES	<p>UA SFM ST 02, 8.2.6: "Integrated pest management, appropriate silviculture alternatives and/or other biological measures shall be preferred to minimize the use of pesticides.</p> <p>8.2.6.1. If pesticides use provides the same effect, alternative silvicultural or biological control methods should be preferred.</p> <p>8.2.6.2. If pesticides are used, the Organisation shall develop a set of measures for their appropriate application.</p> <p>8.2.6.3. For the most effect, the use of pesticides shall be carried out taking into account appropriate timing, seasonality and climatic conditions.</p> <p>8.2.6.4. If pesticides are used in the forest, preventive informing of local people shall be done.</p> <p>8.2.6.5. If biological control agents are used, their use shall be clearly monitored, documented and evaluated for adverse environmental effects".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for integrated pest management and for restricted use of biological control agents.</p>
8.2.7 The standard requires that any use of pesticides is documented.	YES	<p>UA SFM ST 02, 8.2.7: "Any use of pesticides shall be documented and controlled.</p> <p>8.2.7.1. Regular documented monitoring of the list, amount, dosage, and timing of pesticide use shall be performed".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for controlled use of pesticides.</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	YES	<p>UA SFM ST 02, 8.2.8: "WHO Class 1A and 1B pesticides and other highly toxic pesticides shall be prohibited, except where no other viable alternative is available. Any</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
WHO Class 1A and 1B pesticides shall be defined in the national/regional standard.		<p>exception to the usage of WHO Class 1A and 1B pesticides are defined by this standard.</p> <p>8.2.8.1. The use of pesticides of type 1A and 1B by WHO is allowed in exceptional cases, if:</p> <ul style="list-style-type: none"> - there are no other alternative methods and tools; - an expert justification was obtained for this purpose; - the effect of their use outweighs the undesirable environmental or social consequences”. <p>UA SFM TD 09 then defines substances with derogations. It includes three substances, two of them are only allowed to be used in forest nurseries (Benomyl and Malathion), i.e. outside forest. Both Benomyl and Malathion are allowed for use in a number of European countries Benomyl (Ref: T 1991) (herts.ac.uk), Malathion (Ref: OMS 1) (herts.ac.uk).</p> <p>The only substances derogated for the use in forests is Alfa-cypermethrin that can only be applied if no other methods are available, after consultation with pest control organization and based on EIA evaluation. Alfa-cypermethrin is allowed to be used in a number of European countries Alpha-cypermethrin (Ref: OMS 3004) (herts.ac.uk), and is also derogated by FSC, FSC-PRO-30-001a EN List of approved derogations for use of HHP 28102019 (1).pdf.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard prohibits the usage of the WHO 1A and 1B pesticides.</p> <p>General criteria for exemptions are defined directly in the standard and derogations are included in UA SFM TD 09. Two substances are only allowed to be used in forest nurseries. One substance for forest use is approved in EU and is as well derogated by FSC for a number of countries.</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>UA SFM ST 02, 8.2.9: “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>
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>UA SFM ST 02, 8.2.10: “Use of pesticides shall follow the instructions given by the pesticide producer and be implemented with proper approaches and personal protective equipment by trained personnel.</p> <p>8.2.10.1. All pesticides shall be used in accordance with instructions for their use or in accordance with best national practices.</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>8.2.10.2. If pesticides are used, special personal protective equipment shall be provided and applied taking into account the risk assessment.</p> <p>8.2.10.3. All workers involved in pesticides use shall be trained accordingly.</p> <p>8.2.10.4. All workers involved in pesticides use shall undergo periodic medical testing based on risk assessments".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for the proper use of pesticides, adherence to the producer's instructions, usage of proper equipment and training.</p>
8.2.11 The standard requires that where fertilisers are used, they shall be applied in a controlled manner and with due consideration for the environment. Fertilizer use shall not be an alternative to appropriate soil nutrient management.	YES	<p>UA SFM ST 02, 8.2.11: "Where fertilizers 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>8.2.11.1. Fertilizers can be used only in plantations, on permanent forest seed plots, forest seed plantations, in nurseries and greenhouses and in the case of plantation cultivation of non-timber forest products.</p> <p>8.2.11.2. If fertilizers are used, their types, amounts of application, frequency and place of application shall be documented.</p> <p>8.2.11.3. If fertilizers are used, it is necessary to assess adverse environmental and social effects of their use".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements that restricts the use of fertilisers, including ban on using fertilisers as a part of the soil nutrient management.</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>UA SFM ST 02, 8.3.1: "While planning and implementing management measures 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>8.3.1.1. All planned economic activities shall have financial provision, be economically justified and environmentally and socially oriented.</p> <p>8.3.1.2. Forestry and logging operations shall not lead to deterioration of water quality and protection function of forests".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements to maintain production capability of forests.</p>
8.3.2 The standard requires that sound economic performance shall be pursued, taking into account possibilities for new	YES	UA SFM ST 02, 8.3.2: "Sound economic performance shall be pursued, taking into account possibilities for new

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
markets and economic activities in connection with all relevant goods and services of forests.		<p>markets and economic activities in connection with all relevant goods and services of forests.</p> <p>8.3.2.1. Economic activity shall be focused on multiple uses of forest resources, which includes use of timber and non-timber forest products and recreational functions of forests.</p> <p>8.3.2.2. Market conditions shall be taken into account when timber harvesting".</p> <p>UA SFM ST 02,8.3.1.1: "All planned economic activities shall have financial provision, be economically justified and environmentally and socially oriented".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for sound economic performance.</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>UA SFM ST 02, 8.3.3: "Management measures, including 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.</p> <p>8.3.3.1. First of all, it is necessary to take measures, the delay of which will lead to the loss of the forest's inherent functions".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for forest operations being carried out in time and not reducing production capacity of forests.</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>UA SFM ST 02, 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 harvested products shall be effectively used.</p> <p>8.3.4.1. Basic forest inventory shall be carried out at least once every ten years.</p> <p>8.3.4.2. Indicators of the total average stock change and actual volumes of timber harvesting shall be systematically analyzed and reported for comparison in order to ensure a sustainable level in the long term.</p> <p>8.3.4.3. Volumes of harvesting of non-timber forest products with commercial purpose shall not exceed the established limits on special use of forest resources during implementation of secondary forest uses, approved in the prescribed manner".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for sustainable level of harvesting, including conducting forest inventory, analysis of forest increment and sustainable harvesting of both timber and non-wood forest products.</p>
8.3.5 The standard requires that adequate infrastructure such as roads, skid tracks or bridges shall be planned, established and	YES	<p>UA SFM ST 02, 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</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
maintained to ensure efficient delivery of goods and services while minimising negative impacts on the environment.		<p>services while minimizing negative impacts on the environment.</p> <p>8.3.5.1. When constructing roads, skidding routes, bridges, timber loading areas, and other infrastructure, all requirements shall be met to prevent erosion and minimize adverse environmental impact”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements forest infrastructure and minimisation of its impact on the environment.</p>
8.4 Criterion 4: Maintenance, conservation and appropriate enhancement of biological diversity in forest ecosystems		
8.4.1 The standard requires that management planning shall aim to maintain, conserve or enhance biodiversity on landscape, ecosystem, species and genetic levels.	YES	<p>UA SFM ST 02, 8.4.1: “Management planning shall aim to maintain, conserve and enhance biodiversity on landscape, ecosystem, species and genetic levels.</p> <p>8.4.1.1 Management plans shall include materials on the conservation, maintenance and appropriate enhancement of biodiversity on landscape, ecosystem, species and genetic levels”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for conservation, maintenance and enhancement of biodiversity at different levels.</p>
<p>8.4.2 The standard requires that inventory, mapping and planning of forest resources shall identify, protect, conserve or set aside ecologically important forest areas.</p> <p>Note: This does not prohibit forest management activities that do not damage the important ecologic values of those biotopes.</p>	YES	<p>UA SFM ST 02, 8.4.2: “Inventory, mapping and planning of forest resources shall identify, protect, conserve or set aside ecologically important forest areas; specific measures shall be planned for protection and / or conservation of these areas.</p> <p>Note: This does not prohibit forest management activities that do not damage the important ecologic values of those biotopes.</p> <p>8.4.2.1. Management plans shall include data on existing ecologically important forest areas.</p> <p>8.4.2.2. Ecologically important forest areas shall be marked on cartographic materials.</p> <p>8.4.2.3. Management plans shall contain the lists of conservation measures and the lists of restrictions on the implementation of management activities for each identified ecologically important area.</p> <p>8.4.2.4. The Organisation shall not establish plantations and use introduced tree and shrub species for reforestation within ecologically important forest areas”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for inventory, mapping and protection of ecologically important forest areas, including management restrictions in those areas.</p> <p>The definition of the term “Ecologically important forest areas” (3.9) is identical with the definition of PEFC ST</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		1003:2018 while UA SFM ST 02 provides interpretation of different categories in local, Ukraine conditions.
<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>UA SFM ST 02, 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: The requirement does not preclude trade according to CITES requirements.</p> <p>8.4.3.1 The Organisation shall not use for commercial purposes and trade in plant and animal species listed in the CITES Appendices, protected or threatened species and endangered species.</p> <p>8.4.3.2 The Organisation shall have the list of habitats of protected and endangered species of plants and animals within the forestry area of the Organisation.</p> <p>8.4.3.3 Protected zones of the habitats of protected plant and animal species threatened species and endangered species shall be marked on the cartographic materials of the Organisation.</p> <p>8.4.3.4 During the planning and implementing of management activities, the Organisation shall take into account the existing habitats of protected plant and animal species, threatened and endangered species.</p> <p>8.4.3.5 The Organisation, with the involvement of stakeholders and experts, shall develop the effective measures on habitat conservation for protected species and threatened species and endangered species within the Organisation's area and ensure that these measures are properly implemented in practice.</p> <p>8.4.3.6 The Organisation shall take measures to prevent illegal hunting, as well as the trapping and collection of protected species, threatened species and endangered species".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes prohibits commercial use of protected and endangered species and provides additional requirements for protection of those species and their habitats.</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>UA SFM ST 02, 8.4.4: "The 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>8.4.4.1 Management plans shall contain the planned quantities of reforestation works and methods of their implementation (natural regeneration or artificial reforestation), sufficient to ensure the quantity and quality of forests.</p> <p>8.4.4.2 The Organisation shall ensure the successful reforestation to the required extent by the specified time.</p> <p>8.4.4.3 Natural regeneration shall be preferred for regeneration compared to artificial reforestation, (unless</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>forest site conditions don't contribute to the natural regeneration of forests)".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for successful regeneration, with preference to the natural regeneration and reforestation being carried out in required extent and time.</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>UA SFM ST 02, 8.4.5: "Native species that are well-adapted to site conditions shall be preferred for reforestation and afforestation. 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>Limited use of introduced species to assess their impact is possible only under the guidance and control of research institutions.</p> <p>Note: CBD (Convention on Biological Diversity) Guiding Principles for the Prevention, Introduction, and Mitigation of Impacts of Alien Species that Threaten Ecosystems, Habitats or Species are recognised as guidance for avoidance of invasive species.</p> <p>8.4.5.1 Species selected for reforestation and afforestation shall comply with forest site conditions and be predominantly aboriginal species of local origin.</p> <p>8.4.5.2 When selecting species for reforestation the Organisation shall not increase the area with the domination of introduced species except where severe forest site conditions (including generated by climate changes) don't allow applying the aboriginal species.</p> <p>8.4.5.3 Introduced species may only be used if there is conclusive documented evidence (practical experience and / or research results):</p> <ul style="list-style-type: none"> • their advantages in productivity, value and stability over aboriginal (native) species, • their safety for the stable functioning of aboriginal species populations and • the verifiability of such species. <p>Limited use of introduced species to assess their impact is possible only under introduction of their environmental impact monitoring and the guidance and control of regional research institutions.</p> <p>8.4.5.4 The Organisation shall develop and implement effective measures to monitor and control the expansion of invasive introduced species detected within the Organisation's area.</p> <p>8.4.5.5 The plantations of introduced species shall be established only on areas allocated for afforestation".</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 use of local species and for restricted use of introduced species, including scientific evaluation of their impact, evidence on safety of their usage, monitoring and control of expansion of invasive introduced species and establishment of plantations of introduced species only as a result of afforestation.
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>UA SFM ST 02, 8.4.6: "The afforestation, reforestation and other tree planting activities that contribute to the improvement and restoration of ecological connectivity shall be promoted.</p> <p>8.4.6.1 The Organisation shall identify forest areas suitable for reforestation, where forest cover has been lost due to abiogenic and biogenic factors and due to anthropogenic activities as well as non-forest areas, the afforestation of which will improve or restore ecological connectivity.</p> <p>8.4.6.2 The Organisation shall ensure the successful and timely re/afforestation of the areas referred to in 8.4.6.1.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes improvement of ecological connectivity by identification of suitable areas and their reforestation or afforestation.</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>UA SFM ST 02, 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. 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> <p>8.4.7.1 The Organisation shall not use the genetically modified organisms".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard prohibits the use of genetically modified organisms.</p> <p>The definition of the genetically modified organisms is identical with the definition made in PEFC ST 1003:2018.</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>UA SFM ST 02, 8.4.8: "The 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>8.4.8.1 During reforestation planning, the establishment of mixed stands in forest site conditions favourable for their growth shall be preferred.</p> <p>8.4.8.2 During planning of harvesting (final) cuttings, the application of stripped-coupe and/or non-clear cutting</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>systems shall be preferred in suitable forest site conditions with favorable species composition.</p> <p>8.4.8.3 Harvesting (final) cuttings, as well as thinning and sanitary cuttings shall promote the growing of mixed stands in appropriate forest site conditions.</p> <p>8.4.8.4 Thinning and sanitary cutting shall ensure the gradual renewal and formation of forests close to native ones.</p> <p>8.4.8.5 Associate aboriginal tree species shall not be completely removed during thinning and sanitary cuttings.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements promoting horizontal and vertical diversity of forest stands, mixed forests and landscape diversity, including limitation on clearcutting, promotion of shelter-based silviculture system, protection of aboriginal species, etc.</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>UA SFM ST 02, 8.4.9: "Traditional management practices that establish forest ecosystems valuable for biodiversity conservation and nature protection on appropriate sites shall be supported, where appropriate.</p> <p>8.4.9.1 Planning and implementation of harvesting (final) cuttings, thinning and sanitary cuttings, artificial and natural reforestation shall be aimed at the establishing and training of native forest ecosystems from aboriginal tree species that meet forest site conditions and perform the biodiversity conservation and / or environmental protection functions.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements promoting traditional management systems, leading to native forest ecosystems from aboriginal species.</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>UA SFM ST 02, 8.4.10: "Any logging 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</p> <p>8.4.10.1 Any logging shall be conducted in a way that does not cause soil erosion, damage to remaining trees, and exclude the possibility of negative impact on the condition of forests and water bodies.</p> <p>8.4.10.2 Any logging shall be carried out using the technologies that ensure the conservancy of the remaining trees and undergrowth.</p> <p>8.4.10.3 Technological charts for logging of cutting site shall contain the information with the list of biodiversity-valuable objects identified within the cutting site and practical measures to maintain or improve the condition of such objects.</p> <p>8.4.10.4 Erosion control measures (arrangement of fascines and wicker fences, earth embankments, drains, leveling of depressions on skid tracks), clearing of</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>watercourses from logging residues, repairing of the damaged access roads shall be carried out".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements logging operations to avoid damages to soil, remaining trees and water resources, cultural and other protected sites.</p>
<p>8.4.11 The standard requires that infrastructure shall be planned and constructed in a way that minimizes damage to ecosystems, especially to rare, sensitive or representative ecosystems and genetic reserves, and that takes threatened or other key species – in particular their migration patterns – into consideration.</p>	YES	<p>UA SFM ST 02, 8.4.11: "Infrastructure shall be planned and constructed in a way that minimises damage to ecosystems, especially to rare, sensitive or representative ecosystems and genetic reserves, and that takes threatened or other key species – in particular their migration patterns – into consideration.</p> <p>8.4.11.1 Information on planning, design and construction of infrastructure facilities (structures, buildings, forest roads, bridges, timber loading sites, etc.) shall be publicly available.</p> <p>8.4.11.2 Documentation for the construction of infrastructure facilities shall be agreed with the relevant state authorities.</p> <p>8.4.11.3 The design of infrastructure facilities shall be carried out by institutions and enterprises that have the appropriate state-approved permits from authorized state institutions to perform such work.</p> <p>8.4.11.4 The Organisation shall assess and document the potential extent of damage to ecosystems, especially to rare or vulnerable ecosystems and genetic reserves, habitats of endangered species or other key species before commencing design work for the construction of the infrastructural facility. If there is the risk of significant damage - the location of infrastructural facility shall be changed.</p> <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, including public availability of planning instruments, authorities' permissions, competent and authorised construction companies, assessment of potential damages to the environment.</p>
<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.</p>	YES	<p>UA SFM ST 02, 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>8.4.12.1 The Organisation shall initiate the obtaining of necessary permits and promote regulation measures or regulate the number of animal populations that adversely effect on reforestation successfulness, stand growth and biodiversity to the scientifically based level.</p> <p>8.4.12.2 The Organisation shall take measures to protect forests established in the process of reforestation or afforestation from damage by animals".</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Compliance: Conformity Justification: The Standard includes requirements for control of damages caused by animal population, especially in reforestation and afforestation.
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	UA SFM ST 02, 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 biological diversity, taking into account the potential effect on the health and stability of forests and on surrounding ecosystems. 8.4.13.1 To ensure the preservation of biological diversity during clear cuttings, the following elements of forest ecosystem (or their parts) should be left standing, unless their removal is justified by labour protection, safety reasons, passages of vehicles or negative implications for adjacent forest sites: <ul style="list-style-type: none"> • separate clumps of trees with the presence of viable undergrowth, rare plant species, bird's nests and other biodiversity elements; • very old and hollow trees; • standing deadwood, windthrown trees and snags; • endemic and rare tree species. 8.4.13.2 The elements of forest ecosystem (or their parts) that are planned to be left during clear cuttings shall be indicated in the technological charts for logging of cutting site". Compliance: Conformity Justification: The Standard includes requirements for standing and fallen dead wood, old growth and rare trees species, including specification of protected elements, their identification in technological charts and protection during harvesting.
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	UA SFM ST 02, 8.5.1: "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. 8.5.1.1 The Organisation shall maintain and enhance the protective functions of forests by identifying such forests, planning and implementing appropriate measures (see also 8.5.2). 8.5.1.2 The Organisation shall contribute to the maintenance or enhancement of carbon sequestration in forest ecosystems (primarily in trunk timber). 8.5.1.3 Both aboriginal and introduced tree species may be used during the establishment or regeneration of soil conservation and water protection forests in unfavorable forest site conditions, provided that monitoring and control

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>(prevention) of the expansion of potentially invasive introduced species shall be carried out".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for protection of sites with protective functions for society, including identification of such forests, planning and implementing appropriate measure and management in unfavourable forest sites.</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>UA SFM ST 02, 8.5.2: "The areas that fulfil specific and recognised protective functions for society shall be mapped, and forest management plans and operations shall ensure the maintenance or enhancement of these functions.</p> <p>8.5.2.1 Management plans shall contain data about forest areas performing protective functions that were identified during the inventory.</p> <p>8.5.2.2 Forest areas performing protective functions shall be marked on cartographic materials</p> <p>8.5.2.3 Management plans shall contain the lists of management activities to maintain or enhance the protective functions of forest areas of the appropriate designated purpose".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for identification and mapping of forests with protective functions in management plans, including measures to maintain or enhance those functions.</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>UA SFM ST 02, 8.5.3: "The 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>8.5.3.1 The Organisation shall comply with the established requirements for the implementation of management activities to maintain the erosion-preventive functions of forest areas of the appropriate designated purpose.</p> <p>8.5.3.2 Thinning and sanitary cuttings shall be carried out in ways that minimize the risk of soil erosion (see also 8.4.10).</p> <p>8.5.3.3 Technologies, machines and mechanisms that provide the least soil disturbance / deterioration of their water-physical characteristics and prevent erosion processes on logged areas shall be used during logging.</p> <p>8.5.3.4 Technological charts for logging of cutting site shall contain the information with the list of erosion control measures performed during and after logging.</p> <p>8.5.3.5 After the end of logging the erosion control measures shall be performed on erosion threatening parts of the logging area".</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Compliance: Conformity Justification: The Standard includes requirements for protection of soil against erosion, including restriction on usages of technologies and machinery, identification of the erosion control measures in technological charts, during and after harvesting operations.
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	UA SFM ST 02, 8.5.4: "The 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. 8.5.4.1 The Organisation shall comply with the established requirements for management activities to maintain the water protection functions of forest areas. 8.5.4.2 In the mountain forests of the Carpathians, the Organisation shall not lay skidding tracks closer than 20 meters from permanent and 10 meters from temporary watercourses, in the sources of rivers and around them. 8.5.4.3. The measures to minimize the littering of watercourses with logging residues shall be carried during logging. After logging the watercourses shall be cleared from logging residues (see also 8.4.10.4)". Compliance: Conformity Justification: The Standard includes requirements for water protection, including creation of buffer zones and protection of water courses from logging residues.
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	UA SFM ST 02, 8.5.5: "The 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 8.5.5.1 The designing, construction and exploitation of forest roads, bridges timber loading sites 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. (see also 8.4.11). 8.5.5.2 Forest road drainage systems shall be maintained in working condition". Compliance: Conformity Justification: The Standard includes requirements for forest infrastructure and its impacts on soil and water.
8.6 Criterion 6: Maintenance or appropriate enhancement of socio-economic functions and conditions		

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
8.6.1 The standard requires that forest management planning shall aim to respect all socio-economic functions of forests.	YES	<p>UA SFM ST 02, 8.6.1: "The forest management planning shall aim to respect all socio-economic functions of forests.</p> <p>8.6.1.1 Planning materials shall aim to maintain all socio-economic functions of forests.</p> <p>8.6.1.2 Planned activities shall ensure that forests perform forest functions which are important for the local population".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements to respect socio-economic functions of forests.</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>UA SFM ST 02, 8.6.2: "The 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.</p> <p>8.6.2.1 The Organisation shall ensure free access of the population to forests for recreational purposes. Access to forests is restricted only:</p> <ul style="list-style-type: none"> • during the fire-hazardous period, • to areas where logging is carried out, • to the Nature Conservation Fund areas and objects if such visiting is prohibited by the regime of these areas and objects, • as well as in other cases provided by the legislation of Ukraine. <p>8.6.2.2 The Organisation shall agree with the hunting areas users the places for construction of fenced area and other objects related to hunting management, in order to ensure free and safe access of the population to forests for recreational purposes.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard ensure public access to forests and defines cases where the public access can be restricted.</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>UA SFM ST 02, 8.6.3: "The sites with recognised specific historical, cultural or spiritual significance and areas fundamental to meeting the needs of local communities (e.g. health, subsistence) shall be protected or managed in a way that takes due regard of the significance of the site.</p> <p>8.6.3.1 The Organisation together with local communities shall identify areas of specific historical, cultural or spiritual significance and areas fundamental to meeting the basic needs of local communities.</p> <p>8.6.3.2 Areas of specific historical, cultural or spiritual significance and areas fundamental to meeting the basic needs of local communities shall be mapped.</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>8.6.3.3 The Organisation together with local communities shall identify measures for the protection of such areas and possible management measures that will contribute to the preservation of such areas, the sanitation and land improvement”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires protection of sites with historical, spiritual and cultural significance as well as areas fundamental to meeting needs of local communities, including consultation and engagement of the local communities in identification of appropriate measures.</p>
8.6.4 The standard requires that management shall promote the long-term health and well-being of communities within or adjacent to the forest management area, where appropriate supported by engagement with local communities and indigenous peoples.	YES	<p>UA SFM ST 02, 8.6.4: “The 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.</p> <p>8.6.4.1 The Organisation shall keep up-to-date information on local communities within or adjacent to the forest management area and on cooperation with them.</p> <p>8.6.4.2 The Organisation shall manage taking into account the promoting of long-term health and well-being of local communities.</p> <p>8.6.4.3. In case of harming to local communities, the Organisation shall have a mechanism in place to resolve such conflict and redress, and apply it effectively”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for promoting long-term health of local communities, including engagement with local communities and resolution of conflicts.</p>
8.6.5 The standard requires that the best use shall be made of forest-related experience and traditional knowledge, innovations and practices such as those of forest owners, NGOs, local communities, and indigenous peoples. Equitable sharing of the benefits arising from the utilization of such knowledge shall be encouraged.	YES	<p>UA SFM ST 02, 8.6.5: “The best use shall be made of forest-related experience and traditional knowledge, innovations and practices such as those of forest owners/users, NGOs, local communities. Equitable sharing of the benefits arising from the utilization of such knowledge should be encouraged”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes identical requirement to PEFC ST 1003:2018</p>
8.6.6 The standard requires that management shall give due regard to the role of forestry in local economies. Special consideration shall be given to new opportunities for training and employment of local people, including indigenous peoples.	YES	<p>UA SFM ST 02, 8.6.6: “The 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>8.6.6.1 Organisation shall identify the list of resources and ecosystem services that can strengthen the local economy”.</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 promoting local economy and employment, including identification of resources and services that can strengthen the local economy.
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>UA SFM ST 02, 8.6.7: "The 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>8.6.7.1 In order to obtain scientific data to ensure sustainable forest management, the Organisation should cooperate with scientific institutions (for example, by concluding economic contracts for research or advisory services) and / or in various ways to support research within the Organisation".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements promoting research activities by providing cooperation and data to scientific institutions.</p>
9. Performance evaluation		
9.1 Monitoring, measurement, analysis and evaluation		
9.1.1 The standard requires that monitoring of forest resources and evaluation of their management, including ecological, social and economic effects, shall be periodically performed, and results fed back into the planning process.	YES	<p>UA SFM ST 02, 9.1.1: "The 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".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirement for monitoring of forest resources that is identical to the PEFC requirement.</p> <p>In addition, Annex B includes a list of processes that shall be monitored.</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>UA SFM ST 02, 9.1.2: "The health and vitality of forests shall be periodically monitored, especially key biotic and abiotic factors that potentially affect health and vitality of forest ecosystems, such as pests, diseases, overgrazing and overstocking, fire, and damage caused by climatic factors, air pollutants or by forest management operations".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirement for monitoring of forest resources that is identical to the PEFC requirement.</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,	YES	<p>UA SFM ST 02, 9.1.3: "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".</p> <p>Compliance: Conformity</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
shall be regulated, monitored and controlled.		Justification: The Standard includes requirement for control of non-wood forest products that is identical to the PEFC requirement.
9.1.4 The standard requires that working conditions shall be regularly monitored and adapted as necessary.	YES	UA SFM ST 02, 9.1.4: "The working conditions shall be regularly monitored and adapted as necessary". Compliance: Conformity Justification: The Standard includes requirement for monitoring of working conditions.
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	UA SFM ST 02, 9.2.1: "Objectives: The 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;..." Compliance: Conformity Justification: The Standard includes requirements for internal audits that are identical to the PEFC requirements.
b) is effectively implemented and maintained.	YES	UA SFM ST 02, 9.2.1: "Objectives: The internal audit programme at planned intervals shall provide information on whether the management system: b) is effectively implemented and maintained". Compliance: Conformity Justification: The Standard includes requirements for internal audits that are identical to the PEFC requirements.
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	UA SFM ST 02, 9.2.2: "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;" Compliance: Conformity

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Justification: The Standard includes requirements for internal audits that are identical to the PEFC requirements.
b) define the audit criteria and scope for each audit;	YES	UA SFM ST 02, 9.2.2: "The Organisation shall: b) define the audit criteria and scope for each audit;" Compliance: Conformity Justification: The Standard includes requirements for internal audits that are identical to the PEFC requirements.
c) select the auditors and conduct audits to ensure objectivity and the impartiality of the audit process;	YES	UA SFM ST 02, 9.2.2: "The Organisation shall: c) select the auditors and conduct audits to ensure objectivity and the impartiality of the audit process;" Compliance: Conformity Justification: The Standard includes requirements for internal audits that are identical to the PEFC requirements.
d) ensure that the results of the audits are reported to relevant management;	YES	UA SFM ST 02, 9.2.2: "The Organisation shall: d) ensure that the results of the audits are reported to relevant management;" Compliance: Conformity Justification: The Standard includes requirements for internal audits that are identical to the PEFC requirements.
e) retain documented information as evidence of the implementation of the audit programme and the audit results.	YES	UA SFM ST 02, 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 Standard includes requirements for internal audits that are identical to the PEFC requirements.
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	UA SFM ST 02, 9.3.1: "The annual management review shall at least include: a) the status of actions from previous management reviews;" Compliance: Conformity Justification: The Standard includes requirements for management review that are identical to the PEFC requirements.

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
b) changes in external and internal issues that are relevant to the management system;	YES	<p>UA SFM ST 02, 9.3.1: "The annual management review shall at least include:</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 identical to the PEFC requirements.</p>
<p>c) information on the organisation's performance, including trends in:</p> <ul style="list-style-type: none"> • nonconformities and corrective actions; • monitoring and measurement results; • audit results; 	YES	<p>UA SFM ST 02, 9.3.1: "The annual management review shall at least include:</p> <p>c) information on the organisation's performance, including trends in:</p> <ul style="list-style-type: none"> - nonconformities and corrective actions; - monitoring and measurement results according to the indicators from Annex B; - audit results;" <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for management review that are identical to the PEFC requirements.</p>
d) opportunities for continual improvement	YES	<p>UA SFM ST 02, 9.3.1: "The annual management review shall at least include:</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 identical to 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>UA SFM ST 02, 9.3.2: "The outputs of the management review shall include decisions related to continual improvement opportunities and any need for changes to the management system".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for management review that are identical to 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>UA SFM ST 02, 9.3.3: "The documented information as evidence of the results of management reviews shall be retained".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for management review that are identical to the PEFC requirements.</p>
10. Improvement		
10.1 Nonconformity and corrective action		

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
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	<p>UA SFM ST 02, 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;"</p> <p>Compliance: Conformity</p> <p>Justification: The Standard includes requirements for management of non-conformities that are identical to the PEFC requirements.</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>UA SFM ST 02, 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;"</p> <p>Compliance: Conformity</p> <p>Justification: The Standard includes requirements for management of non-conformities that are identical to the PEFC requirements.</p>
c) implement any action needed;	YES	<p>UA SFM ST 02, 10.1.1: "When a nonconformity occurs, the organisation shall: c) implement any action needed;"</p> <p>Compliance: Conformity</p> <p>Justification: The Standard includes requirements for management of non-conformities that are identical to the PEFC requirements.</p>
d) review the effectiveness of any corrective action taken;	YES	<p>UA SFM ST 02, 10.1.1: "When a nonconformity occurs, the organisation shall: d) review the effectiveness of any corrective action taken;"</p> <p>Compliance: Conformity</p> <p>Justification: The Standard includes requirements for management of non-conformities that are identical to the PEFC requirements.</p>
e) make changes to the management system, if necessary.	YES	<p>UA SFM ST 02, 10.1.1: "When a nonconformity occurs, the organisation shall:</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<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 identical to 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>UA SFM ST 02, 10.1.2: "The 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 identical to 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>UA SFM ST 02, 10.1.3: "The organisation shall retain documented information during two certification cycles 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 identical to the PEFC requirements.</p>
b) the results of any corrective action.	YES	<p>UA SFM ST 02, 10.1.3: "The organisation shall retain documented information during two certification cycles as evidence of:</p> <p>b) the results of any corrective action."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for management of non-conformities that are identical to the PEFC requirements.</p>
<p>10.2 Continual improvement</p> <p>The standard requires that the suitability, adequacy and effectiveness of the sustainable forest management system and the sustainable management of the forest shall be continuously improved.</p>	YES	<p>UA SFM ST 02, 10.2: "Continual improvement: The suitability, adequacy and effectiveness of the sustainable forest management system shall be continuously improved.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for continual improvement that are identical to the PEFC requirements.</p>

Annex D: 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	<p>UA SFM ST 05, 4.1: "Certification shall be carried out by impartial independent third parties that cannot be involved in the standard-setting process as a governing body or decision making body, or in forest management and are unaffected by the certification object."</p> <p>UA SFM ST 05, 4.2: "The forest management certification body shall apply the certification principles (impartiality, competence, responsibility, openness, confidentiality, responsiveness to complaints, risk-based approach) as guidance for the decisions in accordance with section 4 ISO/IEC 17021-1".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document requires impartial and independent certification body that cannot participate in standard setting process as governing or decision making body.</p>
2.	Does the scheme documentation require that certification body for forest management certification shall fulfil requirements defined in ISO 17021?	Annex 6, 3.1 YES	<p>UA SFM ST 05, 4.3: "The forest management certification body shall meet the requirements stipulated in ISO 17021-1. These requirements are stated in the relevant sections of this standard and, if necessary, are elaborated or supplemented with special requirements for forest management certification".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document requires compliance with ISO 17021-1.</p>
3.	Does the scheme documentation require that certification bodies carrying out forest certification shall have the technical competence in forest management on its economic, social and environmental impacts, and on the forest certification criteria?	Annex 6, 3.1 YES	<p>UA SFM ST 05, 5.1: "The certification body carrying out forest management certification shall have technical competence in the sphere of forest management regarding its economic, social and environmental impact and the criteria of forest certification in accordance with UA SFM ST 02 and UA SFM ST 03".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document requires technical competence of the certification body in forest management.</p>

No.	PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
	Does the scheme documentation require that certification bodies shall have a good understanding of the national PEFC system against which they carry out forest management certification?	Annex 6, 3.1	YES UA SFM ST 05, 5.1: "The certification body shall clearly understand the National Voluntary Forest Certification System, regarding which it conducts forest management certification". Compliance: Conformity Justification: The document requires good understanding of the PEFC system.
5.	Does the scheme documentation require that certification bodies have the responsibility to use competent auditors and who have adequate technical know-how on the certification process and issues related to forest management certification?	Annex 6, 3.2	YES UA SFM ST 05, 7.1: "The certification body shall be responsible for the activities of competent auditors possessing appropriate technical know-how in certification process and issues associated with forest management certification". Compliance: Conformity Justification: The document requires the certification bodies to use competent auditors.
6.	Does the scheme documentation require that the auditors must fulfil the general criteria of ISO 19011 for Quality Management Systems auditors or for Environmental Management Systems auditors?	Annex 6, 3.2	YES UA SFM ST 05, 7.2: "The auditors of the certification body conducting the forest management certification shall meet the general criteria of ISO 19011 for auditors of quality management systems or for auditors of environmental management systems". UA SFM ST 05, 7.3: "The certification body shall have a documented process to ensure that auditors have personal qualities, knowledge and skills in accordance with section 7 of ISO 19011". Compliance: Conformity Justification: The document requires auditors to meet general criteria for auditors specified in ISO 19011 and requires the certification body to manage the auditors' competencies in compliance with ISO 19011.
7.	Does the scheme documentation include additional qualification requirements for auditors carrying out forest management audits? [1]	Annex 6, 3.2	YES UA SFM ST 05, 7.4: "The certification body shall ensure relevant education of the forest management auditors: complete higher education in forest studies in a nationally accredited educational institution of Ukraine, or obtained in a foreign educational institution, diplomas of which have legal force in Ukraine". UA SFM ST 05, 7.5: "The certification body shall ensure relevant practical work experience of forest management auditors: – for auditor – at least three years of overall length of service; – for lead auditor – at least five years of overall length of service". UA SFM ST 05, 7.6: "The certification body shall ensure relevant specialized work experience of forest management auditors: at least three years of continuous length of service in the forest industry or at

No.	PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
			<p>least three years of length of service in forest educational and/or scientific organisations or forest management certification".</p> <p>UA SFM ST 05, 7.7: "The certification body shall ensure relevant special training of the forest management auditors: successful completion of a training program approved by the Center for preparation and attestation of experts-auditors in the area of forest management certification or forest management and chain of custody certification.</p> <p>7.7.1 Special auditor training consists of an intramural off-the-job part and a distance part.</p> <p>7.7.2 Upon successful completion of training programmes, a certificate of special training is issued to the specialists for a period of three years".</p> <p>UA SFM ST 05, 7.8: "The certification body shall ensure relevant audit experience of forest management auditors:</p> <ul style="list-style-type: none"> – for auditor - four forest management audits for four organisations for a total of at least 12 days as a trainee auditor; – for lead auditor – two audits as a PEFC chain of custody auditor during the past year after completing specialized training programmes. <p>Note: Individuals having at least three years of continuous length of service in PEFC chain of custody certification at the certification body and experience of a lead auditor are not required to participate in audits. This length of service and work experience is considered instead of audits".</p> <p>UA SFM ST 05, 7.9: "The certification body shall ensure relevant competence of the forest management auditors.</p> <p>a) participation in audits:</p> <ul style="list-style-type: none"> – for auditor - at least five audits within NVFCS for three years; – for lead auditor - at least three audits as an audit manager within NVFCS for three years. <p>b) advanced training:</p> <ul style="list-style-type: none"> – for auditor – once in three years according to the training programme approved by the Center for preparation and attestation of experts auditors; – for lead auditor – once in two years according to the training programme approved by the Center for preparation and attestation of experts auditors. <p>c) satisfactory attestation once in three years".</p> <p>UA SFM ST 05, 7.10: "The certification body shall ensure that the audit team has overall competence in forest industry and in forest management which is suitable for audits within NVFCS and includes:</p> <ul style="list-style-type: none"> a) forest management requirements, principles underlying these requirements and their application;

No.	PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
			<p>b) terminology of the forest industry, thematic and sectoral bases of which refer to the forest management standard;</p> <p>c) application of methods, technologies, processes, procedures related to forest management, as well as to the forest industry, so that the audit team can assess compliance within the established audit scope and generate appropriate audit findings and conclusions;</p> <p>d) consultations with stakeholders, in particular local governmental and non- governmental organisations related to the activities of the audited item and representing environmental, social and economic interests;</p> <p>e) principles, methods and techniques of risk management related to forest management, as well as to the forest industry, so that the auditor can identify and assess the risks and opportunities associated with the audit objectives".</p> <p>UA SFM ST 05, 7.11: "The Center for preparation and attestation of experts-auditors performs the procedure of competence assessment (attestation) in accordance with the requirements of UA SFM ST 07 and, in case of a positive decision, issues to the candidate auditor a certificate of the auditor's competency indicating his areas of activity".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document includes comprehensive requirements for auditors, including their education, working experience, training, competences and knowledge and requires a specific attestation by an organisation appointed by the applicant.</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>UA SFM ST 05, 9.1.1: "The certification body shall establish internal procedures for forest management certification in accordance with the NVFCS forest certification scheme."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document requires the certification body to have internal procedures for forest management certification.</p>
9.	Does the scheme documentation require that applied certification procedures for forest management certification shall fulfil or be compatible with the requirements defined in ISO 17021?	Annex 6, 4	<p>YES</p> <p>UA SFM ST 05, 9.1.2: "The applicable procedures for forest management certification shall meet the requirements stipulated in ISO 17021 or be consistent with them".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document requires compliance with ISO 17011-1.</p>
10.	Does the scheme documentation require that applied auditing	Annex 6, 4	<p>YES</p> <p>UA SFM ST 05, 9.1.3: "The applicable audit procedures shall meet the requirements of ISO 19011 or be consistent with them".</p>

No.	PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
	procedures shall fulfil or be compatible with the requirements of ISO 19011?		Compliance: Conformity Justification: The document requires compliance of certification body's auditing procedures with ISO 19011.
11.	Does the scheme documentation require that certification body shall inform the relevant PEFC National Governing Body about all issued forest management certificates and changes concerning the validity and scope of these certificates?	Annex 6, 4 YES	UA SFM ST 05, 8.2.6: "The certification body shall immediately provide the Association NVFCS with information on each forest management certificate issued to any organisation in Ukraine and/or information on any changes concerning the validity and scope of these certificates in the already issued certificates in accordance with the signed PEFC notification contract (UA SFM ST 06)". UA SFM ST 05, 9.7.1.2: "Information on confirmation, suspension, renewal, narrowing or expansion of certification, recertification is timely sent to the Association NVFCS in accordance with the signed PEFC-notification contract (UA SFM ST 06)". Compliance: Conformity Justification: The document requires information on issued certificates to be communicated to NVFCS, the PEFC National Governing Body.
12.	Does the scheme documentation require that certification body shall carry out controls of PEFC logo usage if the certified entity is a PEFC logo user?	Annex 6, 4 YES	UA SFM ST 05, 8.3.1: "The certification body shall develop rules for the PEFC trademark management. Among other things, their traceability shall be ensured by the certification body. There shall be no ambiguity in the PEFC trademark or its accompanying text regarding the subject matter of certification and the issuing certification body". UA SFM ST 05, 8.3.4: "The certification body shall properly control its ownership and take appropriate actions in response to incorrect references to the certification status or misleading use of certificates, PEFC trademarks or audit reports. Note: Such actions can include requirements for corrections and corrective actions, suspension, termination of certification, publication of information on violations and, if necessary, filing a lawsuit". Compliance: Conformity Justification: The document requires the certification body to develop rules to control the PEFC trademark use and references to PEFC certification (8.3.1) and explicitly requires to assess misleading use of PEFC trademarks (8.3.4).
13.	Does a maximum period for surveillance audits defined by the scheme documentation not exceed more than one year?	Annex 6, 4 YES	UA SFM ST 05, 9.2.3.3: "Surveillance audits shall be conducted at least once a year, except in recertification years. The date of the first control audit following initial certification shall not be more than 12 months from the certification decision date. Note: It may be necessary to adjust the frequency of surveillance audits subject to seasonal or other factors".

No.	PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
			<p>UA SFM ST 05, 9.7.2.1.2: A surveillance audit shall be conducted annually. The certification body shall conduct at least four surveillance audits before the certificate expires.</p> <p>Notes:</p> <p>1 “Annually” means once every 12 months.</p> <p>2 If the certificate is valid for less than five years, the number of control audits may be reduced accordingly.</p> <p>3 It may be necessary to adjust the frequency of control audits subject to seasonal or other factors”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document requires annual surveillance audits.</p>
14.	Does a maximum period for re-assessment audit not exceed five years for forest management certifications?	Annex 6, 4	<p>YES</p> <p>UA SFM ST 05, 9.2.3.2: “The audit programme shall include a two-stage initial audit, control audits during the validity period of the certificate after its issuance and recertification audit before expiration of the certificate. There is a five-year cycle for forest management certification. The certification cycle(s) begins with the certification decision. Subsequent cycles begin with the recertification decision (see Clause 9.7.3 of this standard)...”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document requires a five-years certification cycle.</p>
15.	Does the scheme documentation include requirements for public availability of certification report summaries?	Annex 6, 4	<p>YES</p> <p>UA SFM ST 05, 9.5.8.2: “The lead auditor shall prepare a public version (summary) of the audit report taking into account confidential information, including a summary of the conclusions regarding the compliance of the auditee’s forest management with the standard requirements. The summary shall be sent to the Association NVFCS for posting on the official website (http://woodcertification.com.ua/), freely available to the public”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document requires public availability of certification report summaries and satisfies the requirement. The wording of the requirement also satisfies the PEFC interpretation of an appropriate timescale¹⁶ as the summary report published at the NVFCS’s website is available immediately.</p>
16.	Does the scheme documentation include	Annex 6, 4	<p>YES</p> <p>UA SFM ST 05, 9.5.4.2: “Methods of obtaining information include, in particular:</p>

¹⁶ 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>)

No.	PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
	requirements for usage of information from external parties as the audit evidence?		<p>a) interviews and polls of the organisation's employees and stakeholders (e.g. public institution, local government, environmental organisations, etc.)</p> <p>b) observation of processes and operations;</p> <p>d) analysis of documentation and records;</p> <p>e) collection and analysis of data on remote zoning of the Earth and data obtained with using unmanned aerial vehicles, other available external information (publications in mass media, court registers, etc.).</p> <p>UA SFM ST 05, 9.7.2.1.3: "The surveillance audit shall include on-site audits (control audit) to assess the compliance of the certified client's forest management with certain standard requirements for which the certificate is issued. Other surveillance activities may include:...</p> <p>d) collection of data on remote zoning of the Earth, other available external information (publications in mass media, court registers, etc.) and other methods of monitoring the activities of a certified client".</p> <p>UA SFM ST 05, Appendix C requires stakeholders' consultation to be included in the certification report.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document requires stakeholders' consultation and collection and analysis of data from external sources.</p> <p>This satisfies the PEFC requirement as well as the objective of its interpretation.</p> <p>The PEFC Council's interpretation of the requirement clarifies that the "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"¹⁷.</p>
17.	Does the scheme documentation include additional requirements for certification procedures? [¹⁷]	Annex 6, 4	<p>YES</p> <p>UA SFM ST 05 is a comprehensive document that uses structure if ISO 17011-1 and defines requirements additional to ISO 17011-1. Those includes detailed requirements for qualification and competences of auditors, preparation of the audit programme and audit plan, requirements for audit process, definition of non-conformities, content of certification report, specific requirements for group forest management certification, etc.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document includes a vast number of additional requirements that are logically structured within the document.</p>
Accreditation procedures			

¹⁷ <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 <p>UA SFM ST 05, 13.1: "The certification bodies carrying out certification of forest management shall be accredited by an accreditation body that is a part of the International Accreditation Forum (IAF) or a member of IAF recognised regional groups, and performs the procedures described in ISO 17011 and other documents acknowledged in the organisations mentioned above".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document refers to an accreditation body that is a member of IAF and IAF by its statutes only accepts national accreditation bodies (13.1).</p>
19.	Does the scheme documentation require that an accredited certificate shall bear an accreditation symbol of the relevant accreditation body?	Annex 6, 5	YES <p>UA SFM ST 05, 13.3: "Certification shall be carried out within the scope of valid accreditation, which shall be confirmed by an accreditation body's mark / symbol being placed on the forest management certificate".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document requires accredited certification and accreditation mark/symbol being placed on the certificate.</p>
20.	Does the scheme documentation require that the accreditation shall be issued by an accreditation body which is a part of the International Accreditation Forum (IAF) umbrella or a member of IAF's special recognition regional groups and which implement procedures described in ISO 17011 and other documents recognised by the above mentioned organisations?	Annex 6, 5	YES <p>UA SFM ST 05, 13.1: "The certification bodies carrying out certification of forest management shall be accredited by an accreditation body that is a part of the International Accreditation Forum (IAF) or a member of IAF recognised regional groups, and performs the procedures described in ISO 17011 and other documents acknowledged in the organisations mentioned above".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>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	YES <p>UA SFM ST 05, 13.3: "Certification shall be carried out within the scope of valid accreditation, which shall be confirmed by an accreditation body's mark / symbol being placed on the forest management certificate".</p> <p>UA SFM ST 05, 13.4: "A certification body certifying the forest management shall be accredited on the basis of ISO 17021. The scope of accreditation shall cover PEFC ST 2001, PEFC Trademarks Rules – Requirements in the valid version posted on the PEFC website www.pefc.org, UA SFM ST 02, Sustainable Forest Management. General Provisions and UA SFM ST 03 Group Forest Management. Requirements in the valid versions posted on the website of the Association NVFCS http://woodcertification.com.ua/. The PEFC notification agreement in the field of forest management certification, included in UA SFM ST 06, contains the appropriate wording on the need to have and maintain valid accreditation".</p>

No.	PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
			Compliance: Conformity Justification: The document requires “accredited certification”, i.e. certification that is carried within the scope of certification body’s accreditation. The scope shall include the effective documentation of the scheme.
22.	Does the scheme documentation include a mechanism for PEFC notification of certification bodies?	Annex 6, 6	YES UA SFM ST 05, chapter Introduction includes reference to two key process demonstrating the certification body’s competence to carry out the forest management certification, accreditation and notification. UA SFM ST 05, 14: “Notification of the certification bodies is carried out in accordance with UA SFM ST 06.” UA SFM ST 06 defines procedures for notification of certification bodies by NVFCS, including a specimen of the notification contract. Compliance: Conformity Justification: The scheme documentation requires PEFC notification of forest management certification bodies.
23.	Are the procedures for PEFC notification of certification bodies non-discriminatory?	Annex 6, 6	YES UA SFM ST 06, 4.2 “The notification within NVFCS does not include any discriminatory measures, such as the certification body’s country of origin, affiliation to an association, etc.”. Compliance: Conformity Justification: UA SFM ST 06 includes an explicit statement on non-discrimination. The document does not include any requirement or obligation that would be deemed as discriminatory.

Annex E: Stakeholder's representation in the Working Group

Working group composition		
Subgroup	Member	Stakeholder organisation
Forest management bodies	Olexander Vasylovych Rybak	State Agency of Forest Resources of Ukraine
	Lyubov Fedorivna Korchinska	Korostyshevsky Forestry Agro-Industrial Complex
Business and industry	Yuriy Serafymovych Medvedev	Mebelderevprom Association (woodworking industry association)
	Mykola Vasylovych Kogut	Association of Woodworkers and Loggers of Lviv Region
Non-governmental organizations	Petro Sergiyovych Testov	Environment-People-Law (E-NGO)
	Yuriy Mykolaiovych Marchuk	National University of Life and Environmental Sciences Society of Foresters of Ukraine
Scientific and technological community	Nataliya Volodymyrivna Buyskikh	National University of Life and Environmental Sciences of Ukraine
	Igor Mykolaiovych Litsur	Institute of Environmental Economics and Sustainable Development of the National Academy of Sciences of Ukraine
Workers and trade unions,	Lyudmyla Ivanivna Makogonchuk	Trade Union of Forestry Workers of Ukraine
	Oleg Mykolaiovych Ryzhov	State-Owned Enterprise Belotserkovske Forestry
Women and children	Mariya Mykolaivna Maha	NVFCC
	replaced by Valentyna Lvivna Meshkova	Ukrainian Research Institute of Forestry and Forest Melioration
	Alla Eduardivna Obors'ka	NVFCS
	replaced by Yuliya Yuriivna Tsukanova	Hub Educational Institution Zhukyn

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

TJConsulting, Luxembourg

Stakeholders' questionnaire

Assessment of the Ukraine forest certification scheme (PEFC)
against the requirements of the PEFC Council

25 January 2021

Background

In 2020, the Ukraine forest certification scheme (woodcertification.com.ua) was submitted for endorsement by the PEFC Council.

The PEFC Council has selected TJConsulting to carry out assessment of the Ukraine scheme against the PEFC Council requirements. The scheme assessment also includes consideration of stakeholders' comments and views presented within the international consultation announced by the PEFC Council at its website (www.pefc.org) and **this questionnaire that was directly distributed to stakeholders relevant to sustainable forest management in Ukraine.**

TJConsulting would like to encourage all relevant stakeholders to provide information that will contribute as a valuable input necessary for the credible and impartial assessment of the Ukraine scheme.

Stakeholders are free and encouraged to further distribute the questionnaire to another stakeholders in Ukraine.

Objective

This questionnaire aims at obtaining and considering stakeholders comments and views relating to the development of the Ukraine scheme, in particular its forest management standard with requirements for forest management, its openness, transparency, stakeholders participation and consensus building elements.

The questions used in this questionnaire are based on PEFC requirements included in PEFC ST 1001:2017 (Standard setting procedures – Requirements).

The questionnaire shall be returned to TJConsulting (tymrak@tj-consult.com) by **27 February 2021**. In case of an additional time needed, please contact Mr Tymrak directly.

Questionnaire

1. Contact details

Name of the organisation:

Stakeholder group:

E-mail:

2. Have you noticed a public announcement made by the Association NATIONAL VOLUNTARY FOREST CERTIFICATION SYSTEM (PEFC Ukraine) relating to the start of the development/revision of the Ukraine scheme and invitation of stakeholders to participate?

- ☐ Yes ☐ No
☐ at the PEFC Ukraine or related website
☐ by PEFC Ukraine or related body's press release
☐ at public magazine and media
☐ by direct mailing (a letter or e-mail)
☐ other (e.g. Facebook)

Note:

3. Did you have access to the standard setting procedures / rules for the development of the Ukraine forest management standard?¹⁸

- ☐ Yes ☐ No

Note: Yes

4. Have you been invited to nominate your representative to a Working Group (a stakeholder body responsible for the development of Ukraine standard(s) and consensus building)¹⁹

- ☐ Yes ☐ No
☐ by general invitation at the website, in media, etc.
☐ by direct mailing or other communication
☐ We have made a nomination that was
☐ accepted
☐ rejected

Note:

¹⁸ A written document containing organisation and procedures of the standard setting/revision process.

¹⁹ PEFC requires that the standardisation body shall establish a working group/committee with responsibilities for the development of a standard(s) and consensus building that is (i) accessible to stakeholders; (ii) has balance representation of stakeholders decision making and (iii) includes stakeholders with expertise in the subject matter and materially affected stakeholders

5. Have you noticed public consultation on a draft Ukraine forest management standard/scheme?

- ☐ Yes ☐ No
- ☐ at the website
- ☐ by PEFC Ukraine or related body's press release
- ☐ at public magazine and media
- ☐ by direct mailing (e-mail or a letter)
- ☐ other

Note:

6. Have you made comments during the public consultation and have they been considered?

- ☐ Yes, we have submitted comments ☐ No, we have not submitted comments

Our comments:

- ☐ were considered
- ☐ were not considered

Note:

7. Have you submitted any complaint relating to the standard setting/revision process?

- ☐ Yes ☐ No

Note: Click here to enter text.

For those stakeholders that had their representative in the Working Group developing the Ukraine forest management standard

8. Was the work of the Working Group organised in an open and transparent way?²⁰

☐ Yes

☐ No

Note:

9. Have stakeholders reached the consensus on the content of the Ukraine forest management standard?

☐ Yes

☐ No

Note:

Other comments

9. Other comments and views on the Ukraine standard setting/revision process or content of the scheme?

²⁰ PEFC Council requires that members of the working group/committee responsible for the development of a standard(s) shall have access to draft documents in a timely manner; shall be given opportunity to participate in its work and submit their comments; their comments shall be considered in a transparent way.

Annex H: Report from online interview with NVFCS and stakeholders

Due to the coronavirus travel restriction, the online interview of the NVFCS and stakeholders was conducted instead of in-country visit. The online interviews were conducted by Mr. Jaroslav Tymrak during the period from 10 February 2021 until 26 February 2021.

Objective of the visit

The objective of the visit was:

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

Program and timetable of the online interview

Date	10 Feb 2021	22 Feb 2021	23 Feb 2021	24 Feb 2021	26 Feb 2021
Day	Wednesday	Monday	Tuesday	Wednesday	Friday
Itinerary		Stakeholders' interview		Stakeholders' interview	
	Opening meeting Introduction of the scheme Presentation of findings of the draft interim report	Stakeholders' interview	Stakeholders' interview	Stakeholders' interview	Closing meeting Summary of the online interview Presentation of the preliminary assessment results

Stakeholders interviewed

Mr. Tymrak interviewed a number of stakeholders relevant to the development of the NVFCS 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 standard relevant to the stakeholder.

The following organizations have been met and interviewed:

NVFCS	
	Mariya Mykolaivna Maha
	Alla Eduardivna Obors'ka
Forest management bodies	
State Agency of Forest Resources of Ukraine	Olexander Vasylovych Rybak
Berezhany Forestry and Hunting Enterprise, state Enterprise	Mykola Kovalchuk
Khmelnitsky OLMG	Pavlo Stepanovitch Zolotij
Business and industry	
Mebelderevprom Association (woodworking industry association)	Yuriy Serafymovych Medvedev
Association of Woodworkers and Loggers of Lviv Region	Mykola Vasylovych Kogut
Non-governmental organizations	
Environment-People-Law (E-NGO)	Petro Sergiyovych Testov
National University of Life and Environmental Sciences Society of Foresters of Ukraine	Yuriy Mykolaiovych Marchuk
Scientific and technological community	
National University of Life and Environmental Sciences of Ukraine	Nataliya Volodymyrivna Buyskikh
Institute of Environmental Economics and Sustainable Development of the National Academy of Sciences of Ukraine	Igor Mykolaiovych Litsur
Workers and trade unions	
Trade Union of Forestry Workers of Ukraine	Lyudmyla Ivanivna Makogonchuk
State-Owned Enterprise Belotserkovske Forestry	Oleg Mykolaiovych Ryzhov
Consultants, experts	
Legallis LLC	Sergiy Rozvod
State forest agency, Forest certification and monitoring institute	Igor F. Buksha

Certification, accreditation bodies	
SGS	Tetyana Danchuk
Legallis LLC	Polishchuk A.
Belarus accreditation body	Natalja Vladimirovna Davidovitch

Workers and trade unions	
Trade Union of Forestry Workers of Ukraine	Lyudmyla Ivanivna Makogonchuk
State-Owned Enterprise Belotserkovske Forestry	Oleg Mykolaiovych Ryzhov

Key messages and findings

Stakeholders' feedback:

- a) The WG was balanced and included all relevant stakeholders;
- b) The WG was highly professional, including respected professionals within the Ukraine forestry sector (and outside);
- c) The process was managed in highly professional way, members had all necessary documentation in advance distributed by e-mail, records were kept and provided to members;
- 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, COVID situation allowed stakeholders to dedicate more time to the process;
- g) Process was supported by experts and consultants that positively influenced the outputs, negotiations as well as time needed for the process,
- h) The standard was tested on three FMUs and was found as suitable for certification; feedback from the pilot testing was considered by the WG.

Feedback of the Belarus accreditation body:

- a) The accreditation process is on-going (Belarusian accreditation body);
- b) The accreditation will also include experts from concerned accreditation bodies (Russia, Slovakia) and Ukraine,
- c) The accreditation body seems to satisfy the EA rules for “anti-competition” and “cross-frontier accreditation”.

Feedback on Earthsight report:

- a) Many stakeholders consider the report as not fair and ordered to discredit Ukraine forestry sector;
- b) Many of the findings and accusations have been questioned;

- c) Some stakeholders (CB) indicated that they are implementing measures addressing the report findings (criticism of FSC);
- d) Some stakeholders indicated that the report and information from stakeholders or another governmental bodies shall be taken seriously, auditors shall be more objective and impartial and information from external stakeholders should be considered.

Annex I: Action Plan to Prevent the Risk of Illegal Logging and Corruption in Forest Sector of Ukraine

NATIONAL VOLUNTARY FOREST CERTIFICATION SYSTEM

ACTION PLAN TO PREVENT THE RISK OF ILLEGAL WOOD AND CORRUPTION IN FOREST SECTOR OF UKRAINE



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Association National Voluntary Forest Certification System

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The official versions of the document are Ukrainian and English, completely authentic in content. In case of any doubt about the language interpretation, the English version is decisive.

Published on: 12.03.2021

Action plan to prevent the risk of illegal wood and corruption in Ukraine

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Association National Voluntary Forest Certification System

Introduction

This action plan is based on Assessment report of National Voluntary Forest Certification System (NVFCS) by assessor of consulting company - TJ Consulting as part of PEFC Council Endorsement process.

Assessor has given the conclusions and recommendations as part of Assessment report, which go over and above the compliance with the PEFC benchmark requirements.

However, taking into account the both the reputational as well as market impact on both the Ukraine scheme as well as PEFC International by Earthsite's report, the Association National Voluntary Forest Certification System (Association NVFCS) has prepared this document, which hopefully would be considered by PEFC Council in its endorsement decision

Regardless of the validity or justifications of allegations made in the Earthsight report, the NVFCS shall be able to respond to the mentioned allegations. The NVFCS shall have ability to detect the described types of illegal activities either directly in the certification activities or respond to reported illegal activities through accreditation process and/or complaints management at all levels.

Taking into account the seriousness and consequences of such accusations, the NVFCS has prepared this document. Action plan to prevent the risk of illegal wood and corruption in Ukraine going over and above the PEFC International benchmark requirements, but it is important element of the system, that would minimise the risk of illegal and corruption activities taking place on PEFC certified forest area. These measures are addressed in both, the development of the scheme's documentation, rules and guidance but also in implementation of the NVFCS, including awareness, promotional and training activities.

Action plan to prevent the risk of illegal wood and corruption in Ukraine

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Association National Voluntary Forest Certification System

ACTION PLAN

ISSUE DESCRIPTION

Corruption, especially when spread throughout the public authorities and society in general cannot be resolved by certification scheme itself as it requires changes in legislation, operation of public authorities, juridical system, and society's awareness and acceptance of the corrupted activities.

DESIRED OUTCOME

Changes in legislation, operation of public authorities, juridical system, and society's awareness and acceptance of the corrupted activities.

STRATEGIC ACTION	RESPONSIBLE	STAKE-HOLDERS	METRIC	DATE OF IMPLEMENTATION	POSSIBLE IMPACT	PROGRESS ON MARCH 2021
<p>Membership at Public Council at the State Agency of Forest Resources of Ukraine, whose main tasks are:</p> <ul style="list-style-type: none"> • promoting the realization of the constitutional right of citizens to participate in the management of state affairs on forestry and hunting, use, protection, reproduction and forest and hunting resources on the 	<p>Executive Director of Association NV FCS Alla Oborska Yuriy Marchuk, Chairman of the Working Group of the Association for the Development of Forest Management Standards</p>	<p>Forest owner / Forest management Body</p>	<p>Proposals from NVFCS representatives considered</p>	<p>Start in February 2021 and on regularly basis</p>	<p>Through its representation in the Public Council, the Association will be able to:</p> <ul style="list-style-type: none"> • participate in the preparation of draft regulations on the implementation of state policy in the field of forestry and hunting; • participate in the public examination of the activities of the State Forestry Agency and the public anti-corruption examination of normative legal acts and draft normative legal acts developed by the State Forestry Agency; • exercise public control over the State Forest Agency's compliance with public 	<p>Executive Director Alla Oborska as a representative of the Association "National System of Voluntary Forest Certification" and Yuriy Marchuk, Chairman of the Working Group of the Association for the Development of Forest Management Standards, in February 2021 were elected to the Public Council at the State Agency of Forest Resources of Ukraine.</p>

Action plan to prevent the risk of illegal wood and corruption in Ukraine

Association National Voluntary Forest Certification System

<p>basis of sustainable development, conservation of forest biodiversity;</p> <ul style="list-style-type: none"> • exercising public control over the activities of the State Forestry Agency; • promoting the State Forestry Agency to take into account public opinion when preparing proposals to ensure the formation and implementation of state policy in the field of forestry and hunting. 					<p>proposals and comments, ensure its transparency and openness, access to public information, as well as its compliance with regulations aimed at preventing and combating corruption;</p> <ul style="list-style-type: none"> • submit proposals for public consultation of the State Forestry Agency. 	
<p>Membership in Group on Developing Strategy for Forest Management of Ukraine until 2035</p>	<p>Executive Director of Association NV FCS Alla Oborska Yuriy Marchuk, Chairman of the Working Group of the Association for the Development of Forest Management Standards</p>	<p>Forest owner / Forest management Body</p>	<p>Changes in legislation</p>	<p>June 2020-January 2021</p>	<p>The State Agency of Forest Resources of Ukraine is a body that implements the state policy in the field of forestry and hunting and since June 2020 is subordinated to the Ministry of Environmental Protection and Natural Resources of Ukraine. This ministry has developed the State Strategy for Forest Management of Ukraine until 2035, which is currently undergoing a strategic environmental assessment.</p>	<p>The State Strategy for Forest Management of Ukraine until 2035 was developed, currently is undergoing a strategic environmental assessment. The strategy envisages a set of measures that, in particular, will help to overcome the shadow schemes in the forest sector of Ukraine. Alla Oborska and Yuriy Marchuk were members of the Working Group for Strategy Development, and their proposal included the item "At the state level, there should be comprehensive support for the national forest certification system under the PEFC scheme".</p>

Action plan to prevent the risk of illegal wood and corruption in Ukraine

Association National Voluntary Forest Certification System

ISSUE DESCRIPTION						
Precautionary approach: The scheme owner (NVFCS) should take pre-cautionary approach towards the legality.						
DESIRED OUTCOME						
Association NV FCS together with its stakeholders, identify and analyse the pre-dominant illegal activities in the forestry sector, especially those where different or conflicting interpretations of the legislation in force exist.						
STRATEGIC ACTION	RESPONSIBLE	STAKE-HOLDERS	METRIC	DATE OF IMPLEMENTATION	POSSIBLE IMPACT	PROGRESS ON MARCH 2021
Preparation of Checklist for Auditors with the list of pre-dominant illegal activities in the forestry sector	Working Group on System Development	All groups of Stakeholders	Identify and do not issue the certificates for Organisations, where illegal activities are present	February 2021 prepare the checklist and use it on regular basis	This checklist is a part of UA SFM ST05 and the filled checklists would be obligatory part of Audit report.	The Checklist is ready and it was discussed with NGOs and main stakeholders to ensure the content of all possible illegal activities, the UA SFM ST 05 was changed accordingly to make the checklist obligatory for all interview with stakeholders.

Action plan to prevent the risk of illegal wood and corruption in Ukraine

Association National Voluntary Forest Certification System

ISSUE DESCRIPTION							
The scheme owner (NVFCS) should actively promote the legality requirements towards certified entities, certification bodies, accreditation body(ies) and affected stakeholders.							
DESIRED OUTCOME							
All stakeholders have clear understanding which kind of actions are illegal, recognizing the responsibility and using the mechanisms to fight with such actions within their competence.							
STRATEGIC ACTION	RESPONSIBLE	STAKE-HOLDERS	METRIC	DATE OF IMPLEMENTATION	POSSIBLE IMPACT	PROGRESS ON MARCH 2021	
Trainings for all stakeholders	Expert of FLEG program and author of 'Prevention and counteraction to corruption in the forestry sector' Oleh Storchous	All groups of Stakeholders	Training were done and the desired outcome were achieved	April 2021 first training (online) and then minimum twice per year	Ukrainian Law concerning prevention and counteraction to corruption in the forestry is quite complicated, and often requires special legal knowledges. As Association has no fulltime expert in this sphere the negotiations was run and was achieved agreement for cooperation with the expert of FLEG program and author of 'Prevention and counteraction to corruption in the forestry sector' Oleh Storchous. The expert would prepare the presentation materials and would make trainings for all stakeholders twice per year. Also, he would join the Commission of Complaints and Appeals when it would be necessary.	The expert is confirmed the cooperation with Association.	

Action plan to prevent the risk of illegal wood and corruption in Ukraine

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Association National Voluntary Forest Certification System

ISSUE DESCRIPTION						
<p>The illegal and corrupted activities are difficult to be detected within regular audits. Therefore, the scheme owner (NVFCS) should strengthen the following activities as part of auditing and certification process:</p> <ul style="list-style-type: none"> - the role of stakeholders consultation (especially local communities and E-NGOs); - employees interviews; - collection and analysis of relevant information from media, public reports, etc. - remote sensing techniques. 						
DESIRED OUTCOME						
Adapted certification process and auditing allows detect the illegal and corrupted activities within regular audits.						
STRATEGIC ACTION	RESPONSIBLE	STAKE-HOLDERS	METRIC	DATE OF IMPLEMENTATION	POSSIBLE IMPACT	PROGRESS ON MARCH 2021
Amendment of UA SFM ST 05, Requirements for Certification Bodies operating against Forest Management Standard	Working Group on System Development	Certification Bodies / Accreditation Bodies	Effective procedure for auditors to detect illegal actions and prevent certification process for such Organizations	February 2021 and on regularly basis if necessary	Auditor would have clear and sufficient instrument to identify the illegal and corruption actions on all stages of the certification process.	<p>The UA SFM ST 05 was amended:</p> <p>1) Consultation with stakeholder shall be done with filling the Anti-Bribery and Corruption Checklist</p> <p>2) As part of the preliminary inspection of the applicant, the auditor shall check the applicant for violations of applicable legislation that critically contradict with the requirements of the standard UA SFM S T02, UA SFM ST 03 using the following resources:</p> <p>a) https://opendatobot.ua/ or https://youcontrol.com.ua/ - court decisions, arrears of taxes and payments, wages and other information;</p> <p>b) https://inspections.gov.ua/ - inspection control, inspection reports</p>

Action plan to prevent the risk of illegal wood and corruption in Ukraine

Association National Voluntary Forest Certification System

Amendment of program of special training of auditors in the field of forest management certification in the NVFCS	Head of Center of Preparation and Attestation of Experts for Forest Management Audits	Certification Bodies / Accreditation Bodies	Program includes Prevention of risk of illegal wood and corruption in Ukraine	April 2021	Auditor would receive the Attestation only in case if he understood the importance of prevention the risk of illegal wood and corruption in Ukraine and he is able to use all the instruments listed in UA SFM ST 05, Requirements for Certification Bodies operating against Forest Management Standard	and instructions of various controlling bodies, in particular the State Ecological Inspectorate; 3) The auditor shall verify and collect information from the following official resources: a) State Enterprise "Forestry Innovation and Analytical Center" https://www.ukrforest.com/ - register of logging tickets, mapping of fellings; b) Public cadastral map https://map.land.gov.ua/ - land use right, nature reserve fund, Emerald Network.
The decision to amend the program was made and Head of Center of Preparation and Attestation of Experts for Forest Management Audits has received an order to do this in 1 month at latest.						

Action plan to prevent the risk of illegal wood and corruption in Ukraine

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Association National Voluntary Forest Certification System

ISSUE DESCRIPTION						
The scheme owner (NVFCS) should actively use its complaints and dispute settlement procedures to engage itself in resolving the reported cases of corruption and illegal activities.						
DESIRED OUTCOME						
Strengthening complaints and dispute settlement						
STRATEGIC ACTION	RESPONSIBLE	STAKE-HOLDERS	METRIC	DATE OF IMPLEMENTATION	POSSIBLE IMPACT	PROGRESS ON MARCH 2021
Amendment of UA SFM ST 04, Procedure for Managing Complaints and Appeals	Working Group on System Development	All groups of stakeholders	Amen- ded UA SFM ST 04, Proce- dure for Mana- ging Comp- laints and Appeals, available applica- tion form on website	April 2021	Any natural or legal person may file a complaint about violations of the applicable legislation in the field of forest protection, water protection and other environmental legislation, tax legislation, as well as corruption in the NVFCS. The application would be available online on website of Association.	We have added a special paragraph to our UA SFM ST 04 standard to manage the process. Interaction with stakeholders to prevent violations of applicable legislation of Ukraine and any manifestations of corruption in the National Voluntary Forest Certification System Any natural or legal person may file a complaint about violations of the applicable legislation in the field of forest protection, water protection and other environmental legislation, tax legislation, as well as corruption in the NVFCS.

Action plan to prevent the risk of illegal wood and corruption in Ukraine

Association National Voluntary Forest Certification System

ISSUE DESCRIPTION						
The Association shall use GIS to monitor and control the certification bodies and certificate holders.						
DESIRED OUTCOME						
Reliable instrument to protect the good name of the PEFC Council and the Association NVFCS						
STRATEGIC ACTION	RESPONSIBLE	STAKE-HOLDERS	METRIC	DATE OF IMPLEMENTATION	POSSIBLE IMPACT	PROGRESS ON MARCH 2021
Cooperation with DEEP Green Ukraine	Management of Association NVFCS	NGO	Established cooperation	July 2021	Regular control of certification holders. The goal of the Deep Green Ukraine project is to create an independent system that will allow analyzing open data of government agencies (land cadastre, forest maps, logging tickets, etc.) and satellite data, detect illegal logging and monitor planned. The system will allow you to find out in close-up mode how much forest has disappeared from the forest map of Ukraine and when it happened. The resource will contribute to the transparency of forest use, will help preserve and restore the country's forest fund. Initially, the system will be tested in four pilot regions: Kyiv, Lviv, Zakarpattia and Odesa, and then will be scaled to the	Agreed to sign a Memorandum for cooperation.

Action plan to prevent the risk of illegal wood and corruption in Ukraine

Association National Voluntary Forest Certification System

				whole of Ukraine. Once launched, the online system is planned to be transferred to the balance of the relevant government agencies to provide administration and technical support. It is planned that the system of monitoring illegal deforestation will be fully operational in early summer 2021.
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Action plan to prevent the risk of illegal wood and corruption in Ukraine

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

Chapter / requirement	PEFC Council's comment	Assessor's response
General	Inconsistent references to the PEFC documentation or other referenced documentation	Originally, the PEFC documentation was referenced without the year (e.g. PEFC ST 1003) while the full document identification (e.g. PEFC ST 1003:2018) was included in chapter 6. However, there were some exemptions or mistakes in the final draft report. All references made throughout the report now include full identification of the PEFC documentation (e.g. PEFC ST 1003:2018)
General, Annex C	Requests for clarification	Some requests for clarifications have been made. The text was clarified. Specific responses to each of the comment was made in a draft version of the report that is available to the PEFC Council.
Annex C	The term "aboriginal" is not precise and should be replaced by "native" or "indigenous".	The standard in Ukraine language is using the word "аборигенні (aborigeni)" in requirements 8.5.1.3, 8.4.8.5, 8.4.5.2 and the term "корінних" in 8.4.9.1. Both terms in Ukraine language are correct and are widely used in connection with species, types of ecosystems or forest stands in both scientific as well as more general information sources (including Ukraine version of Wikipedia). Concerning translation of the terms into English, the translation of "аборигенні" and "корінних" into "aboriginal" is correct. English dictionaries consider the term "aboriginal" as synonymus to "aborigine, autochthon, indigene (also indigen), native" (Aboriginal Definition of Aboriginal by Merriam-Webster (merriam-webster.com)). Therefore, the wording in both the Ukraine as well as English versions of the standard is considered as complying with PEFC ST 1003 that uses the term "native". Within the context of the requirements 8.5.1.3, 8.4.8.5, 8.4.5.2, 8.4.9.1, it is clear that the meaning is synonymous to "native" or "indigenous" and indicates "belonging to a locality". However, it should be noted that the terms "native" or "indigenous" is more commonly used in forest-related papers.
Annex C	Definition of "forest" (3.13) and its compatibility with UN definition and PEFC ST 1003:2018.	3.13: The Standard uses definition of the term "forest" that is based on the definition written in PEFC ST 1003:2018 (with reference to the source in the United Nations report (2002)). The Ukraine definition defines specific criteria that are complying with the definition of the "forest" in PEFC ST 1003:2018, 3.7: a) Defines 0.1 ha as minimum area of a forest (PEFC ST 1003 states 0.05-1 ha), b) Defines 30 per cent with trees with the potential to reach a minimum height of 2 m (PEFC ST 1003 states 10-30 % to reach 2-5 m).

Annex C	<p>Definition of forest conversion (3.15)</p> <p>Is there a reason, why specifically “natural and semi-natural forests” are covered by the forest conversion definition and not “forest” in general?</p> <p>Under 3.9 <i>Ecologically important forest areas</i> the UA specific notes, d) refers to more natural categories.</p>	<p>Within the Ukraine context, forests are classified as either “natural”, “semi-natural” or forest plantation. This classification is referenced in the Ukraine legislation^[30] as well as in scientific or other forest related papers ^[31, 32, 33].</p> <p>This concept follows the FAO classification where the Ukraine forests consist of natural forests (primary - 59.000 ha and modified natural - 4.729.000 ha), semi-natural 4.399.000 ha and plantations (productive 81.000 ha and protective 300.000 ha) (see Countries (fao.org)).</p> <p>Also State of Europe's Forests 2020^[34] published by Forest Europe (formerly the MCPFE) uses the classification of “undisturbed by men / semi-natural / plantations”.</p> <p>In this context, the scheme requirements for forest conversion comply with the PEFC requirement as:</p> <ul style="list-style-type: none"> c) All forest land shall not be converted (changed) from the designed functions and d) natural and seminatural forests (means all forests except forest plantations) shall not be converted to non-forest land forest plantations. <p>Concerning terms used in the definition of “Ecologically important forest areas” (3.9, bullet point d), the Standard refers to three terms (primary forests, quasi-primary forests, and natural forests) with further reference and link to the forest legislation (Forest Code).</p> <p>Following the definitions made in the legislation, the term “natural forests is a broader category that also includes “primary” and “quasi-primary forests” (see Лісовий кодекс України від 21.01.1994 № 3852-XII (rada.gov.ua)).</p> <p>“Natural forests (natural forest ecosystems) - forests (forest ecosystems), in which anthropogenic influence was locally and temporarily manifested, but it did not change the cenotic structure of phytocoenoses and therefore natural forest ecosystems are able to regenerate (recover) naturally in a short time to the state of primary forest ecosystems”.²¹</p> <p>Primary forests (primary forest ecosystems) - primordial, ancient forest (natural forest ecosystems), which was formed naturally and in the course of development has not undergone direct anthropogenic influence.²²</p>
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²¹ Природні ліси (природні лісові екосистеми) - ліси (лісові екосистеми), в яких локально і тимчасово проявився антропогенний вплив, але він не змінив ценотичної структури фітоценозів і тому природні лісові екосистеми здатні протягом короткого часу регенеруватися (відновитися) природним шляхом до стану пралісових екосистем.

²² Праліси (пралісові екосистеми) - споконвічний, стародавній ліс (природні лісові екосистеми), що сформувався природним шляхом і в ході розвитку не зазнав безпосереднього антропогенного впливу.

		<p>Quasi-primary forests are conditionally primary forest ecosystems in which there was a slight temporary anthropogenic influence, which did not change the natural structure of forests and, at the end of which, the natural state of ecosystems is fully reproduced within a short period.²³</p> <p>Within the context of scheme requirements / definition for forest conversion (3.15), the term “natural forests” covers primary forests, quasi-natural forests and other natural forests.</p>
Annex C	<p>Definitions: Non-forest ecosystem (3.31) and non-forest land (3.32)</p> <p>3.31 and 3.32: Difference is not clear. Why needed these two?</p>	<p>The term non-forest ecosystem (3.31) is the opposite to the term “forest” and is more general as it is not linked to the formal classification of land by the Ukraine legislation.</p> <p>The term “non-forest land” (3.32) is strictly linked to the Ukraine legislation (as referenced in the standard) and is opposite to the term “forest land”. It should be noted that the legislation defines the term “forestry land”²⁴ (Землі лісгосподарського призначення) that consists of “forest land” (лісові землі) and “non-forest land” (нелісові землі). The definition (3.32) states the “non-forest land” is used for forestry purposes.</p> <p>This means that “non-forest land” will always be “non-forest ecosystem”. Then, “non-forest ecosystems” on “forestry land” are called “non-forest land”.</p>
Annex C	Definitions: Non-wood forest products (3.33)	<p>The Standard makes definition of “non-wood forest products” (3.33) but it also uses the term “non-timber forest products” or “non-timber harvesting”. This inconsistency is only in the English version as the original Ukraine version only uses one term is used as there is only one term for both non-wood and non-timber (“Недеревна”).</p> <p>Although this can be classified as inconsistency in usage of terminology, it has no impact on usage or interpretation of the standard:</p> <ul style="list-style-type: none"> a) Terms “wood” and “timber” are synonymous, there is no risk that the terms could be used in different meaning; b) The term “non-wood forest products” or “non-timber forest products” are self-explanatory. The definition (3.33) only stipulates what is already included in the term itself (product of biological origin other than wood); c) The Ukraine version, against which the certification will be carried out, includes only one term. <p>There was added an observation to the report relating to the English translation of the Standard.</p>

²³ Квaziпраліси - умовно пралісові екосистеми, в яких відбувся незначний тимчасовий антропогенний вплив, що не змінив природної структури лісостанів і при припиненні якого натуральний стан екосистем повністю відтворюється протягом короткого періоду.

²⁴ Article 5. Forestry lands: Forestry lands include forest lands on which forest plots are located and non-forest lands occupied by agricultural lands, waters and swamps, buildings, communications, unproductive lands, etc., which are provided in the prescribed manner and used for forestry needs.

Annex C, 8.1.1	<p>Is there a reference somewhere what “timely” means and what forest site conditions are considered?</p> <p>Since clear cuttings are always a sensitive issue it would be good to clarify these details. Is there any reference to this in the UA Forest Code or somewhere else?</p>	<p>PEFC ST 1003 does not include requirements relating to clearcutting and does not include specific threshold for regeneration, except requirement 8.3.3 (...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...). From this point of view the Standard complies with the PEFC requirements.</p> <p>However, the Ukraine Forest Code, Article 80 includes specific requirements for reforestation to take place no later than 2 years after the harvest.</p>
Annex C	<p>Quality of translation</p> <p>“8.2.1.4. Measures shall be taken to prevent and control improper hunting, non-timber harvesting and other inappropriate use of natural resources”.</p> <p>Probably a translation error, my understanding is that this means:</p> <p><i>...prevention and control of unsustainable wildlife management practices, unsustainable harvest of non wood forest products... (as defined in 3.33)</i></p>	<p>The translation is “word-to-word” translation from the Ukraine language.</p> <p>Although the translation could be improved, the wording and its objective are sufficiently clear to avoid any possible misinterpretation.</p> <p>The issue of translation will be noted as an observation.</p>
Annex C	<p>Quality of translation</p> <p>8.2.2.2 and 8.2.2.3: It's unclear what “reliable and preserved undergrowth” stands for.</p>	<p>8.2.2.2. Soil damage on the harvesting site in the</p> <p>The term “reliable undergrowth” [in Ukraine “надійний підрост”] is used in meaning of “sufficient” naturally regenerated undergrowth [sufficient for the purposes of successful natural regeneration].</p> <p>The term “preserved undergrowth” [in Ukraine “збережений підрост”] is used to indicate the naturally regenerated undergrowth that is preserved on the area after the completion of the harvest.</p> <p>The English translation could be improved. However, it has no impact on useability of the Standard. The terms are used in the Ukraine legislation and have specific meaning in Ukraine forest-related terminology.</p>
Annex C	<p>8.5.1 The term “trunk” timber</p> <p>Editorial suggestion: standing stock</p>	<p>“8.5.1.2 The Organisation shall contribute to the maintenance or enhancement of carbon sequestration in forest ecosystems (primarily in trunk timber).”</p> <p>The meaning of “trunk timber” is “stem timber”, i.e. timber that is distinct from branches and roots. The original Ukraine language includes the term “стовбуровій деревині” which means “stem” or “trunk” wood.</p>



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Assessment of the Ukraine Forest Certification Scheme against the requirements of the PEFC Council

Post-endorsement evaluation

4 December 2023



Woodmotion

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Background

In 2021, the Association National Voluntary Forest Certification System (PEFC Ukraine) submitted its forest certification scheme for mutual recognition and endorsement by the PEFC Council.

The PEFC assessment procedures (PEFC GD 1007:2017) required an in-country visit to become a part of the assessment. During the period of the assessment (2021-2022), COVID travel restrictions did not allow to conduct the in-country visit and the PEFC Council decided to conduct the evaluation relating to the in-country visit until 31 December 2023.

In June 2023, the applicant scheme submitted a revised documentation, in particular a forest management standard and requirements for group certification. The PEFC Council has requested the assessor to also evaluate changes made in the new editions of the scheme documentation and its continuing compliance with the PEFC requirements.

The PEFC Council together with the assessor and in consultation with the applicant agreed that in order to reach objectives specified below, the evaluation can be conducted using remote techniques.

Objective

The objective of this evaluation is to:

- a) Evaluation of the new edition of the scheme documentation (June 2023);
- b) Evaluation of the implementation of the “Action plan to prevent the risk of illegal wood and corruption in forest sector of Ukraine”;
- c) Online interview of the PEFC certified forest management unit, related certification body and other stakeholders involved in the development and implementation of the Ukraine scheme.

The evaluation of the “new edition of the scheme documentation” has been reported in Part 1 of this report. Evaluation of the “Action Plan” and outcomes of the on-line interview are included in Part 2 of this report¹.

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.

¹ Part 1 of the report was also submitted separately to the PEFC Council in September 2023.

Methodology and techniques

This part of the evaluation has been based on:

- a) Interviews with the relevant stakeholders,
- b) Evaluation of documents and other evidence provided by “PEFC Ukraine” and other stakeholders.

This report also considers outcomes of the interviews carried out during the main evaluation (2021).

Conclusions and recommendations

Following the assessment of information and evidence provided by PEFC Ukraine as well as received during interviews with relevant stakeholders, the assessor makes the following conclusions and recommendations to be considered by the PEFC Council:

- a) PEFC Council **should consider** the “**third editions**” of the **scheme documentation** UA SFM ST 02:2020 (Sustainable forest management. General provisions) and UA SFM ST 03:2020 (Group forest management. Requirements) as complying with the PEFC benchmark requirements:
 - The development and approval of the changes to the scheme documentation (UA SFM ST 02:2020 and UA SFM ST 03:2020) comply with the PEFC Council requirements for “time-critical revision” (PEFC ST 1001:2017);
 - All changes made to the documents (UA SFM ST 02:2020 and UA SFM ST 03:2020) are editorial in nature and do not have an impact on compliance with the PEFC requirements (PEFC ST 1003:2018 and PEFC ST 1002:2018).
- b) PEFC Ukraine **has implemented all elements of the “Action Plan”** presented to the PEFC Council during the initial assessment (2021);
- c) **Illegal logging and corruption in forestry sector remains a considerable issue** although many actions have been taken by the Ukraine government, responsible agencies as well as private sectors;
- d) Ongoing illegal logging and corruption require a **continuous attention** of PEFC Ukraine and it is therefore recommended that PEFC Ukraine continues in all activities presented in the “Action Plan” and invents new tools and activities preventing illegal logging taking place in PEFC certified forests, including, but not limited to:
 - Taking into account available resources, PEFC Ukraine should continue in its **pro-active engagement with the government and other stakeholders**, participating in their events and organize its own training and educational seminars;
 - PEFC Ukraine should continue in receiving **feedback from certification bodies** on application of the Checklist illegal activities and corruption and its contribution to the certification and auditing process;

- PEFC Ukraine should further provide certification bodies with **guidance on relevant initiatives mapping illegal logging and corruption** in the forestry sector and ensure that those organizations / initiatives are pro-actively contacted and outcomes of their work used during the certification and auditing process;
 - PEFC Ukraine should continue organizing **auditors trainings on annual basis** to ensure that new auditors are properly trained and existing auditors receives up-to-date information being. The training should also allow PEFC Ukraine to receive relevant feedback from the auditors on implementation of the PEFC requirements and needs for further development;
 - PEFC Ukraine should continue with an active engagement and partnerships with civil society and **encourage them to actively report known cases of illegal activities and corruption** to PEFC Ukraine using the complaints tool or any other means available to them;
 - PEFC Ukraine should continue actively using the data and other information of the **“ForestCom” initiative** and use informative as well as normative tools that would ensure that outcomes of its work are considered during the certification process.
- e) **Following the outcomes of this post-endorsement evaluation, the PEFC Council should assign the PEFC Ukraine forest certification scheme a full endorsement status.**

PART 1: EVALUATION OF THE NEW EDITION OF THE SCHEME DOCUMENTATION (JUNE 2023)

1.1 Evaluation of compliance with the standard setting / revision requirements

PEFC Ukraine introduced the changes to UA SFM ST 02:2020 (*Sustainable forest management. General provisions*) and UA SFM ST 03:2020 (*Group forest management. Requirements*) to reflect changes in the national legislation and reorganisation of entities responsible for the management of state-owned forests.

The changes to the documentation were developed and approved as “time-critical revision” as outlined in clause 9.3 of UA SFM ST 01:2020 (and 9.3 of PEFC ST 1001:2017)².

Conclusions

The development and approval of the changes to the scheme documentation complies with the PEFC Council requirements for “time-critical revision” (PEFC ST 1001:2017):

- Changes were introduced as a result of the changes in the Ukrainian legislation,
- The changes were introduced in relevant standards (*UA SFM ST 02:2020* and *UA SFM ST 03:2020*) that were approved by the highest-decision making body of PEFC Ukraine (*Council of the Association National Voluntary Forest Certification System*) on 28 November 2022 and published as the “third edition” of the documents,
- The documents have been made publicly available at the website of PEFC Ukraine³,
- Justification for changes is described directly in publicly available document (*UA SFM ST 03:2020*, chapter Introduction) and refers to changes in the national legislation and re-organisation of the state forestry. The justification has been also communicated at the PEFC Ukraine website as a part of the news on the new edition of the scheme documentation⁴.

² It should be noted that taking into account the nature of the changes to the scheme documentation, PEFC Ukraine could also apply procedures for “editorial revision” outlined in PEFC ST 1001:2017, clause 9.2.

³ <http://woodcertification.com.ua/en/Documentation-System/>

⁴ [PEFC \(woodcertification.com.ua\)](http://woodcertification.com.ua/)

1.2 Evaluation of changes made to the PEFC Ukraine scheme documentation

PEFC Ukraine made editorial changes to two documents: UA SFM ST 02:2020 (*Sustainable forest management. General provisions*) and UA SFM ST 03:2020 (*Group forest management. Requirements*).

All changes in the scheme documentation reflect a change in the Ukraine legislation and reorganisation of entities managing state forests. In the course of reforming the organisational structure of the state forestry, the government form a single legal entity responsible for management of state forests with multiple “forest management units that are represented by “branches, representative offices, departments or other separate units”.

The following two tables show all changes to the Ukraine documentation (except the front and second page that refer to the “new edition” of the documents and new approval and transition dates.

New wording of the documents is showed in **bold** and parts deleted from the documents are indicated by ~~strikethrough~~.

Conclusion of the assessment:

All changes made to the documents (UA SFM ST 02:2020 and UA SFM ST 03:2020) are editorial in nature and do not have an impact on compliance with the PEFC requirements (PEFC ST 1003:2018 and PEFC ST 1002:2018).

UA SFM ST 02:2020, third edition		
Chapter	New version	Compliance with PEFC ST 1003 :2018
1.2	1.2 The standard is intended to be used by legal entities (their branches, representative offices, departments or other separate units) and / or private individuals engaged in forest management and / or forest use.	No impact on compliance with PEFC requirements. The change clarifies that the FMU can also be an organisational unit of a single legal entity.
3.18	Forest Management Unit (FMU) An area with clearly defined boundaries, on all or part of which there is forest or TOF and which is managed according to a unified management plan. Note 1: A unified management plan can be developed for a legal entity or its branches, representative offices, departments and other separate units, as well as for private individuals. Note 2: One legal entity may have one or more Forest Management Units.	No impact on compliance with PEFC requirements. New definition of FMU with notes that the FMU can also be an organisational unit of a single legal entity.

UA SFM ST 02:2020, third edition		
Chapter	New version	Compliance with PEFC ST 1003 :201
Intro- duction	<p>Operation of public forestries is based on the territorial principle, they are subordinated to territorial bodies that implement state policy in the field of forestry and hunting, which coordinate and control their activities.</p> <p>In the course of reforming the forest sector at the state level, a single legal entity is formed, which includes forest management units (branches, representative offices, departments or other separate units) according to the definition of the standard UA SFM ST 02 Sustainable Forest Management. General provisions.</p>	<p>No impact on compliance with PEFC requirements.</p> <p>The change clarifies that the FMU can also be an organisational unit of a single legal entity.</p>
3.6	<p>Management Unit (FMU)</p> <p>An area with clearly defined boundaries, on all or part of which there is forest or TOF and which is managed according to a unified management plan.</p> <p>Note 1: A unified management plan can be developed for a legal entity or its branches, representative offices, departments and other separate units, as well as for private individuals.</p> <p>Note 2: One legal entity may have one or more Forest Management Units.</p>	<p>No impact on compliance with PEFC requirements.</p> <p>New definition of FMU with notes that the FMU can also be an organisational unit of a single legal entity.</p>
3.7	<p>3.76 Forest Owner / Forest User</p> <p>Person, group of people or legal entity (its branch, representative office, department or other separate unit (FMU)) having the legal or tenure right, or executing traditional or customary tenure rights, to manage the forest in a clearly defined certified area and the ability to implement the requirements of the sustainable forest management standard in this area.</p>	<p>No impact on compliance with PEFC requirements.</p> <p>The change clarifies that the FMU can also be an organisational unit of a single legal entity.</p>
4.3b	<p>b) public forestries in the territory of the relevant administrative division subordinated to the territorial body implementing the state policy in the field of forestry and hunting. The group entity can be one of the participants or the specified territorial body; b) branches, representative offices, departments or other separate units (FMU) of a single legal entity of state ownership. The group entity can be one of the participants or an individual person or another authorized body;</p>	<p>No impact on compliance with PEFC requirements.</p> <p>The change clarifies that the FMU can also be an organisational unit of a single legal entity.</p>
5.1.1.1g, Note 5.1.2.1a, Note	<p>Note: The requirements for "participants' commitment" and "written contract or other written agreement with all participants" may also be satisfied by the commitment of and written agreement of a pre-existing organisation or group or the members participation, such as:</p> <ul style="list-style-type: none"> – a forest owners/forest users association; – b) subordination in the territory of the relevant administrative division to the territorial 	<p>No impact on compliance with PEFC requirements.</p> <p>The change clarifies that the FMU can also be an organisational unit of a single legal entity.</p> <p>In this case, the single legal entity with several FMUs represents a "pre-existing group" participating in the group certification.</p>

	body implementing the state policy in the field of forestry and hunting; branches, representative offices, departments or other separate units (FMU) of a single legal entity of state ownership;	
9.3.1.1e	if necessary, additional sampling requirements are specified in case of group forest certification with participants who had joint membership in pre-existing organisations or groups, such as forest owners/forest users associations; subordination in the territory of the relevant administrative division to the territorial body that implements the state policy in the field of forestry and hunting; branches, representative offices, departments or other separate units (FMU) of a single legal entity of state ownership; parent (main) enterprise and subsidiaries; sustainable forest management programme; tax offices (9.3.2.4).	<p>No impact on compliance with PEFC requirements.</p> <p>The change clarifies that the FMU can also be an organisational unit of a single legal entity.</p> <p>In this case, the single legal entity with several FMUs represents a "pre-existing group" participating in the group certification.</p>

PART 2: EVALUATION OF THE “ACTION PLAN” IMPLEMENTATION AND STAKEHOLDER INTERVIEWS

2.1 “Action plan to prevent the risk of illegal wood and corruption in forest sector of Ukraine”

Area	Implemented in 2021	Planned (2021) to be implemented
Engagement with state administration in combatting illegal logging and corruption and developing forest strategy;	●	●
Checklist for auditors with the list of pre-dominant illegal activities	● ⁵	
Training for all stakeholders		●
Strengthening stakeholders' consultation and use of external sources of information as a part of the audit	● ⁶	
Programme for training of auditors and their attestation		●
Amendment to the complaints' procedures with special reference to illegal activities and corruption	● ⁷	●
Cooperation with E-NGO “Deep Green of Ukraine”		●

2.1.1 Engagement with state administration in combatting illegal logging and corruption and developing forest strategy

Public Council of the State Agency of Forest Resources of Ukraine

Alla Oborska and Yuriy Marchuk (both representatives of PEFC Ukraine) have become members of the Public Council of the State Agency of Forest Resources of Ukraine⁸.

The Public Council is a consultative body that is responsible for discussion and consultation on the government's strategy for the use of forest resources, strategy relating to hunting and game management and legislation relevant to forestry, timber market and game management.

Both, Alla Oborska and Yuriy Marchuk took an active role in the Council, and participated in its four (4) meetings organised in between 2021 and 2023. The key topics of the meetings were:

⁵ UA SFM ST 05, 7.10d and Appendix 4

⁶ UA SFM ST 05, 9.2.2.1, 7.10d

⁷ UA SFM ST 04, 5.5

⁸ Minutes of the Public Council meetings

- Governmental Strategy of Forest Resources Management in Ukraine;
- On Amendments to the Law of Ukraine "On Environmental Impact Assessment";
- Draft law No. 4197 "On the timber market";
- Measures relating to illegal decisions of local self-government bodies, to prevent interference of local self-government bodies in the economic activity of state forestry enterprises;
- Legislative regulation of the mechanism of formation of the social price for firewood for the household needs of the population;
- Development of a strategy for the development of the hunting industry;
- Reform of management of the state-owned forests.

The Public Council has also discussed impact of the European Regulation on Deforestation (EUDR), collection of geolocations of harvest sites and public availability of geolocation polygons of PEFC and FSC certified forest management units in Ukraine.

Conclusion:

Both Alla Oborska and Yuriy Marchuk are active members of the Public Council. Their participation in the consultative body allows them to receive documents relating to forest legislation and strategy in its early stage, provide comments on them taking into account the operation of the PEFC scheme in Ukraine. This will also provide PEFC Ukraine with possibility to implement any necessary changes to the PEFC Ukraine certification scheme.

Working group on developing Governmental Strategy of Forest Resources Management in Ukraine till 2035

The working group on developing "Governmental Strategy of Forest Resources Management in Ukraine till 2035" was created by order of the Ministry of Environmental Protection and Natural Resources of Ukraine. Both, Yuri Marchuk and Alla Oborska have joined the working group and have been actively participating in its meetings⁹. Yuri Marchuk participated in the development of almost all sections of the Strategy, Alla Oborska developed the sections "Provision of weighty contribution of forests in the economic development" and "Competitive recovery of forest sector production".

The Strategy formally recognises forest certification (PEFC and FSC) as a market based instrument that should be supported by the Ukraine government.

The Strategy was approved by the Resolution of the Cabinet of Ministers of Ukraine in December 2021¹⁰.

⁹ [Formal establishment of the working group](#) document

¹⁰ [Formally approved Strategy](#)

2.1.2 Checklist for auditors with the list of pre-dominant illegal activities

PEFC Ukraine has developed a Checklist for audits of sustainable forest management that covers predominant illegal activities in Ukraine (including those referenced by the Earthsight report (2018))¹¹.

The Checklist is referenced in UA SFM ST 05¹² as a mandatory tool to be used by certification bodies in Ukraine. PEFC Ukraine informed certification bodies about the new obligation to use the Checklist already in 2021¹³. PEFC Ukraine has also participated in the first certification audits and confirmed utilisation of the Checklist during the audit¹⁴.

During the interview with the certification body, evidence was provided on incorporation of the Checklist in the certification body's procedures.

Conclusion:

PEFC Ukraine has developed and put into practice a Checklist on illegal activities and corruption. The Checklist has been used in forest management audits.

PEFC Ukraine should continue in receiving feedback from certification bodies on application of the Checklist and its contribution to the certification and auditing process.

2.1.3 Training for all stakeholders

PEFC Ukraine has organized two seminars for stakeholders focused on the PEFC scheme and its role in combatting illegal logging. The first seminar was organized in May 2021 and the second in October 2021¹⁵. In total, the seminars were attended by more than 60 people representing forest management units, state administration, non-governmental organizations, lawyers and other actors¹⁶.

The seminar was led by Mr. Oleg Storchous, an advocate specializing in forest law and its enforcement¹⁷.

No further seminars have been organised during 2022 and 2023, mainly due to on-going war and limited resources available for organisation of such events.

Conclusion:

PEFC Ukraine organised stakeholder seminars referenced in the Action Plan.

Presentations were made by a competent lawyer specializing in the area of forest law enforcement and corruption. The seminars reached intended stakeholders.

¹¹ COMPLICIT IN CORRUPTION, How billion-dollar firms and EU governments are failing Ukraine's forests, 2018, www.earthsight.org.uk

¹² UA SFM ST 05. Requirements for Certification Bodies operating Certification against the Forest Management Standard

¹³ E-mail communication between PEFC Ukraine and certification bodies (March 2021)

¹⁴ Confirmed by the interview of both, PEFC Ukraine and certification body's representatives

¹⁵ Powerpoint presentations from the seminars

¹⁶ Report on stakeholders seminars

¹⁷ [Oleg Storchous contact details](#)

Taking into account available resources, PEFC Ukraine should continue in its pro-active engagement with stakeholders, participating in their events and organise its own training and educational seminars.

2.1.4 Strengthening stakeholders' consultation and use of external sources of information as a part of the audit

PEFC Ukraine has introduced in UA SFM ST 05 a requirement for public consultation in the certification audit, including references to the legality and anti-corruption Checklist and references several websites and initiatives, both governmental as well as non-governmental¹⁸ that should be consulted during the application review and auditing stage of the certification process.

The interview with the certification body confirmed that the certification body conducted stakeholders consultation and is aware (uses) external sources of information to identify potential illegal activities in the audited forest management units. Unfortunately, the certification body has only received limited number of responses from contacted stakeholders. It should be noted that all five (5) issued certificates are located in regions with rather low risk of illegal activities.

Conclusion:

PEFC Ukraine introduced stakeholders consultation as a normative requirement of for certification bodies. Those requirements have been implemented by the certification body.

However, PEFC Ukraine should further provide certification bodies with relevant initiatives mapping illegal logging and corruption in the forestry sector and ensure that those organisations/initiatives are pro-actively contacted during the certification and auditing process.

2.1.5 Programme for training of auditors and their attestation

PEFC Ukraine established a training programme for forest management auditors and conducted first training on 13-14 September 2021 with 7 auditors being present¹⁹.

The training focused on the whole certification and auditing process, including information on illegal activities, sources of relevant information and "Illegal activities and anti-corruption Checklist"²⁰. The training also included practical exercises and examples of sources of information to be considered within the certification and audit process.

On 2-3 October 2023, PEFC Ukraine conducted an additional on-line training for forest management auditors with participation of 4 auditors working for the only certification body operating the PEFC forest management certification in Ukraine²¹.

¹⁸ UA SFM ST 05, Requirements for Certification Bodies operating Certification against the Forest Management Standard

¹⁹ Report on conducted auditor training, 13-14 September 2021

²⁰ Presentations from auditors training, 13-14 September 2021

²¹ Report on conducted auditors training, Programme of the training, 2-3 October 2023

The training also included a specific session dedicated to illegal harvesting and corruption in forestry sector²² with practical application of external sources of information relating to illegal harvesting in Ukraine²³.

Conclusion:

PEFC Ukraine conducted two auditors training in September 2021 and then in October 2023. Both trainings included information on illegal harvesting and corruption. The later training provided detailed presentation of sources of information for illegal logging, system of harvests authorisation, harvests and transport documentation.

The training participants covered all auditors currently engaged in PEFC forest management certification in Ukraine.

PEFC Ukraine should continue in organizing auditors trainings on annual basis to ensure up-to-date information being used by auditors as well as feedback from the certification bodies to PEFC Ukraine.

2.1.6 Amendment to the complaints' procedures with special reference to illegal activities and corruption

PEFC Ukraine has amended its procedures for disputes and complaints resolution²⁴ by adding specific clauses relating to complaints on illegal activities and corruption in a forestry sector.

The written procedures are supported by a "complaints section" at the PEFC Ukraine website²⁵ available in both English and Ukraine language. The section is easily accessible from the main page of the website.

Since 2021, no complaint has been received.

During the on-line interview, PEFC Ukraine representatives provided a reason for the no contribution from stakeholders as a lack of interest to directly report to PEFC Ukraine and the fact that the current PEFC certified forest management units are located outside the regions with reported illegal activities.

Conclusion:

PEFC Ukraine developed procedures and infrastructure allowing stakeholders to submit complaints on illegal activities and corruption in PEFC certified forests.

However, since 2021 no complaint has been filed.

²² Presentations from auditors training, 2-3 October 2023

²³ <https://forestcom.org.ua>, <https://lk.ukrforest.com/registry>

²⁴ UA SFM ST 04, Procedure for Managing Complaints and Appeals

²⁵ [File a complaint \(woodcertification.com.ua\)](https://woodcertification.com.ua), [Подати скаргу \(woodcertification.com.ua\)](https://woodcertification.com.ua)

PEFC Ukraine should continue with an active engagement and partnerships with civil society and encourage them to actively report known cases of illegal activities and corruption to PEFC Ukraine using the complaints tool or any other means available to them.

2.1.7 Cooperation with E-NGO “Deep Green of Ukraine”

Unfortunately, the project DEEP Green stopped its activities in July 2021, as its main technical developers left Ukraine.

However, the Association continued working with one of the members of this project, the NGO "ForestCom"²⁶ (<https://forestcom.org.ua/en/>). Activity of NGO "ForestCom" is supported by the US Forest Service International Programs.

PEFC Ukraine with this initiative a Memorandum of Cooperation²⁷ that outlines general support in activities of mutual interests, fighting against illegal logging and corruption in forestry sector, using and acting upon information received from partner's organisation.

The "ForestCom" has established several tools identifying potential occurrence of illegal logging in Ukraine, including:

- Forest Monitoring Lab;
- Wood Identification Lab;
- Electronic Mapping of Forest Activities;
- Illegal logging estimation activities;
- Policy Developments.

The "ForestCom" has developed a web-oriented tool that allows identification of planned logging activities at the PEFC certified forests²⁸.

Using satellite images and on-site evaluations, the “ForestCom” monitors changes in the forest cover and compares them with planned activities and harvesting permits issued by the Ukrainian forest administration²⁹.

Another project covered by the “Forest Monitoring Lab” monitors of old growth forests changes in the Ukrainian Carpathians based on satellite images³⁰.

PEFC Ukraine monitors outcome of the “ForestCom” activities and so far, no activities that would require actions of the relevant certification body or PEFC Ukraine have been detected.

Alla Oborska (PEFC Ukraine) also actively participated in various events organised by non-governmental initiatives. In particular, she spoke at in a public seminar «*Ways to independently confirm the legality of timber harvesting in Ukraine*» organised by the “ForestCom” with participation of the Ministry of Environment and Natural Resources, the Ministry of Economy, the State Agency of Forest Resources, the Forestry Innovation and Analytical Center, environmental NGOs and other stakeholders³¹.

²⁶ “Лісові ініціативи і суспільство”

²⁷ Memorandum of Cooperation, 10 January 2022

²⁸ https://forestcom.org.ua/mapforest/drohobych_branch/main/index.html#10/49.3090/23.4998

²⁹ <https://forestcom.org.ua/en/news-post/changes-forest-cover-were-identified>

³⁰ <https://forestcom.org.ua/en/news-post/monitoring-report-ukrainian-carpathians-may-2023>

³¹ Programme of the seminar, 30 June 2022

Conclusion:

PEFC Ukraine has established an active cooperation with the “ForestCom” initiative, (formerly “Deep Green”). This provides an access to outcomes of the initiatives as well as to knowledge and know how on its operation. The data analysed by the “ForestCom” initiative can be used as a warning signal in the certification process and other processes of the PEFC Ukraine certification scheme.

PEFC Ukraine should continue actively using the data and other information of the “ForestCom” initiative:

- a) Encouraging certification bodies through training and guidance to actively use the outcomes of the “ForestCom” initiative during the certification process (as a part of the evaluation of external sources of information and public consultation);
- b) Developing a mandatory requirement for certification bodies to use the outcomes of the “ForestCom” initiative;
- c) Analysing itself the outcomes of the “ForestCom” information relating to PEFC certified entities and requesting certification bodies to act upon them.

2.2 Stakeholders interviews

In September and October 2023, the assessor conducted a series of on-line interviews to verify the current information on the illegal logging in Ukraine and implementation of the Action Plan.

The interviews conducted in 2023 complemented the interviews organised in 2021 as a part of the main evaluation of the Ukraine scheme. While the 2021 interviews focused primarily on the standard setting process and illegal logging in Ukraine, the 2023 interviews focused on the implementation of the “Action Plan”. Those objectives were reflected by the selection of the stakeholders.

Organisation	Name	Interview 2021	Interview 2023
PEFC Ukraine	Mariya Mykolaivna Maha	•	
	Alla Eduardivna Oborska	•	•
	Yuriy Mykolaiovych Marchuk		•
Forest management bodies			
State Agency of Forest Resources of Ukraine	Olexander Vasylovych Rybak	•	
Berezhany Forestry and Hunting Enterprise, state Enterprise	Mykola Kovalchuk	•	
Khmelnitsky OLMG	Pavlo Stepanovitch Zolotij	•	
	Ihor Burkovkij	•	•
Business and industry			
Mebelderevпром Association (woodworking industry association)	Yuriy Serafymovych Medvedev	•	
Association of Woodworkers and Loggers of Lviv Region	Mykola Vasylovych Kogut	•	
Non-governmental organizations			
Environment-People-Law (E-NGO)	Petro Sergiyovych Testov	•	•
National University of Life and Environmental Sciences Society of Foresters of Ukraine	Yuriy Mykolaiovych Marchuk		•
ForestCom	Dmytro Karabchuk		•
Scientific and technological community			
National University of Life and Environmental Sciences of Ukraine	Nataliya Volodymyrivna Buyskikh	•	
Institute of Environmental Economics and Sustainable Development of the National Academy of Sciences of Ukraine	Igor Mykolaiovych Litsur	•	
Workers and trade unions			

Trade Union of Forestry Workers of Ukraine	Lyudmyla Ivanivna Makogonchuk	•	
State-Owned Enterprise Belotserkovske Forestry	Oleg Mykolaiovych Ryzhov	•	
Consultants, experts			
Legallis LLC	Sergiy Rozvod	•	
State forest agency, Forest certification and monitoring institute	Igor F. Buksha	•	
Certification, accreditation bodies			
SGS	Tetyana Danchuk	•	
Legallis LLC	Polishchuk A.	•	
BM Certification	Andra Ozeta		•
	Janis Svirksts		•
	Modris Okmanis		•
Belarus accreditation body	Natalja Vladimirovna Davidovitch	•	

Outcomes of the interviews

Situation on illegal logging and corruption in Ukraine

- There have been some changes since the last Earthsight report but illegal logging and corruption is still perceived as an important issue in the forestry sector, at all levels;
- Co-operation between state and private (NGOs) sector has slightly improved but depends on individual organizations and authorities;
- NGOs and private initiatives such as “ForestCom” have developed analytical tools to identify potential areas with illegal activities; they are supported by foreign aids (mainly from the UK and US) but still lack significant resources to achieve their goal; semi-automated analysis of satellite images (Sentinel 2) are complemented by on-site survey of their own personnel or alerts made by local people; the outcomes of the NGO work are in general welcomed by law enforcement bodies, ForestCom reported 50 cases to authorities and this resulted in administrative charges, criminal investigations (19) and court actions (2);
- Forest certification plays only a limited role in combating illegal logging; FSC is perceived as not sufficiently responding to illegal logging accusations; PEFC has only certified a limited forest area where a single comment has been considered by the certification body (a remark of the ENGO representative);
- New legislation in Ukraine requires electronic traceability of timber delivered on the market either through direct contracts or via two exchange organizations (Ukraine energy exchange and Ukraine Cargo Exchange);
- The Ukrainian government is implementing new measures relating to illegal logging, mainly driven by losses in tax revenues;

- There are several layers of investigation of illegal logging activities, including controls by forest administration bodies, environmental agency, police but also by the “State Bureau of Investigation” as criminal activity under the Ukrainian legal system;
- Ukraine has implemented a system of formal approval of timber harvests (harvest tickets) and their digitalization, including geolocation of the timber origin and GPS tracking of deliveries from forests to the first processing; E-NGOs perceive the limitation of this system in that fact that not all information is publicly available;
- EUDR is currently under discussion in Ukraine and is perceived as additional stimuli to control illegal logging in the country; Ukraine will be prepared to deliver evidence on timber legality, including geo-localization of harvests and timber traceability;
- Ukraine implemented a significant reform of the management of state forests that results in decentralization of the organizational structure and establishment of more independent organizations managing specific forest management units;
- Significant part of the Ukraine forests is directly affected by the war (5.5 mil. ha)

Cooperation within the forestry sector and outside

- PEFC Ukraine is actively working in the Public Council of the State Agency of Forest Resources of Ukraine and in the Task Force on forest strategy until 2035;
- New Strategy until 2035 has been adopted with references to transparency in timber market and also public support to certification schemes;

Assessing legality and corruption in forest certification audits

- Legality and corruption checklist has been introduced in the scheme documentation and is used by certification bodies in their audits;
- PEFC Ukraine participated in the first audits;
- Currently, there is only one certification body, BM Certification, operating forest certification in Ukraine;
- PEFC Ukraine as well as the certification body have not received complaints relating to forest management, illegal harvesting or corruption. This is mainly explained by relatively small area of PEFC certified forests as well as the fact that the region in which the certified units are located are less impacted by illegal logging;
- The certification bodies are expected to use information developed by initiatives such as “Deep Green” or “ForestCom”. However, this is at this stage a guidance promoted by PEFC Ukraine rather than a mandatory requirement; There is still opportunity to use the “ForestCom” data in the certification audits or partner with the “ForestCom” on conducting field audits;
- Certification body conducts a legality and anti-corruption tests as a part of the application review and contractual relationship; in regions with prevailing illegal activities, the certification body intends to conduct a risk assessment of illegal activities;

- Certification bodies are required to conduct stakeholders consultation. However, the approach is often passive, i.e., waiting and then acting on stakeholders' comments rather than actively searching for relevant and available information;
- For many stakeholders, an active approach and contribution requires significant resources that are in Ukraine currently lacking;
- Currently, for 5 PEFC certified forest management units, the certification body has not noticed illegal activities and received only one response from a local authority. In regions with reported illegal activities, the certification body intends to conduct a pre-assessment using available information and consider them in Stage 1 of the audit.

Training and competences of the certification bodies

- Currently, there is only one certification body, BM Certification, operating forest certification in Ukraine;
- Their auditors have been trained by PEFC Ukraine (2021, 2023);
- The certification body is also performing its own trainings on conducting audits, ISO 19011, etc. as a part of its quality management system;
- The certification body also conducts its own impartiality tests, auditors shall provide information on their other activities, impartiality is stipulated in employment contracts.

Standard setting and PEFC scheme development

- a) The PEFC Ukraine's Working Group (WG) for standard setting was balanced and included all relevant stakeholders;
- b) The WG was highly professional, including respected professionals within the Ukraine forestry sector (and outside);
- c) The process was managed in highly professional way, members had all necessary documentation in advance distributed by e-mail, records were kept and provided to members;
- 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, COVID situation allowed stakeholders to dedicate more time to the process;
- g) Process was supported by experts and consultants that positively influenced the outputs, negotiations as well as time needed for the process,
- h) The standard was tested on three FMUs and was found as suitable for certification; feedback from the pilot testing was considered by the WG.

