

No.	PEFC requirement	BFCS Standard & Document	Assessor's comment	Response submitted	Amendments to address NC (Incorporating feedback from PEFC)
PEFC B&H 03:2021, PEFC National Standard for Sustainable Forest Management in Bosnia and Herzegovina					
1	8.1.4 The standard requires that forest conversion shall not occur unless in justified circumstances where the conversion: b) entails a small proportion (no greater than 5 %) of forest type within the certified area;	<p><u>Criterion nr. 1.3.</u></p> <p>It is restricted to decrease the area of forest and forest land through conversion to other types of land use, including conversion of primary forests to forest plantation unless in justified circumstances where the conversion is in compliance with:</p> <p>a) national legislation relevant for land use and is a result of government authorities planning and decision including consultations with materially and directly affected people and organizations and if conversion of forest area is lower of 1%;</p>	<p>It is insufficiently ensured that the 1% will be of the forest type within the certified area. Furthermore, the requirement for coppice forest is too general. It is unclear whether the law requires conversion to entail only a small proportion of the forest type; else it might also induce misinterpretation / interpretation disputes for conversion of coppice forests, as the relationship between clauses 1.3 and 4.8 is unclear.</p>	<p>The issue of requirement for coppice forests is cleared. Namely, the previous part of the text that was confusing in relation to interpretation of criterion 1.3 and 4.8. are cleared by deletion of the unnecessary part of the criterion 4.8.</p> <p>The reason for these unclarity was basically due to use of term "forest conversion" on the Balkans. It is a term often used in change of the quality of forest stand by direct measure of conversion, (for example from coppice to high forest) when certain degraded type of forest is cleared and other more productive or resistant type of forest species are planted.</p>	<p>Update in 1.3</p> <p>Conversion of primary forests to forest plantations is strictly forbidden.</p> <p>It is prohibited to decrease the area of forest and forest land in certified forest area through conversion to other types of land use, including conversion of primary and natural forests to forest plantation, unless in justified circumstances where the conversion is in compliance with:</p> <p>a) national and regional policy and legislation applicable for land use and forest management, and is a result of government authorities planning and decision including consultations with affected stakeholders;</p> <p>b) size of the converted forest area is lower than 1% of the forest type within certified forest area;</p> <p>c) does not have negative impact on the threatened (including vulnerable, rare or endangered) forest ecosystems, culturally and socially significant areas, important habitats of threatened species and other protected areas;</p> <p>d) contribute to long-term conservation, economic and social benefits;</p> <p>e) does not destroy areas of significantly high carbon stock;</p> <p>Update in 4.8.</p>

					Traditional way of management of coppice forest can be conducted on appropriate habitats and in cases where it is ecologically, socially and economically viable.
2	8.1.4 The standard requires that forest conversion shall not occur unless in justified circumstances where the conversion: c) does not have negative impacts on ecologically important forest areas, culturally and socially significant areas, or other protected areas;	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 b) entails a small proportion (no greater than 5 %) of forest type within the certified area; and c) does not have negative impacts on ecologically important forest areas, culturally and socially significant areas, or other protected areas; and d) does not destroy areas of significantly high carbon stock; and e) makes a contribution to long-term conservation, economic, and social benefits	The requirement for coppice forest is too general. It is unclear whether the law requires conversion not to have negative impacts on ecologically important forest areas, culturally and socially significant areas, or other protected areas; else it might also induce misinterpretation / interpretation disputes for conversion of coppice forests, as the relationship between clauses 1.3 and 4.8 is unclear.	<p>Thee issue of requirement for coppice forests is cleared. Namely, the previous part of the text that was confusing in relation to interpretation of criterion 1.3 and 4.8 are cleared by deletion of the unnecessary part of the criterion 4.8.</p> <p>The reason for these unclarity was basically due to use of term "forest conversion" on the Balkans. It is a term often used in change of the origin of forest, (for example from coppice to high forest) when certain degraded type of forest is cleared and other more productive or resistant type of forest species are planted.</p>	<p>Update in 1.3</p> <p>Conversion of primary forests to forest plantations is strictly forbidden. It is prohibited to decrease the area of forest and forest land through conversion to other types of land use, unless in justified circumstances where the conversion is in compliance with:</p> <ul style="list-style-type: none"> a) national and regional policy and legislation applicable for land use and forest management, and is a result of government authorities planning and decision including consultations with materially and directly affected people and organizations and if conversion of forest area is lower of 1% in certified forest area; b) does not have negative impact on the threatened (including vulnerable, rare or endangered) forest ecosystems, culturally and socially significant areas, important habitats of threatened species and other protected areas; c) contribute to long-term conservation, economic and social benefits; d) does not destroy areas of significantly high carbon stock; <p>Update in 4.8.</p> <p>Traditional way of management of coppice forest can be conducted</p>

					on appropriate habitats and in cases where it is ecologically, socially and economically viable.
3	8.1.4 The standard requires that forest conversion shall not occur unless in justified circumstances where the conversion: d) does not destroy areas of significantly high carbon stock	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 b) entails a small proportion (no greater than 5 %) of forest type within the certified area; and c) does not have negative impacts on ecologically important forest areas, culturally and socially significant areas, or other protected areas; and d) does not destroy areas of significantly high carbon stock; and e) makes a contribution to long-term conservation, economic, and social benefits	The requirement for coppice forest is too general. It is unclear whether the law requires conversion not to destroy areas of significantly high carbon stock; else it might also induce misinterpretation / interpretation disputes for conversion of coppice forests, as the relationship between clauses 1.3 and 4.8 is unclear	<p>Thee issue of requirement for coppice forests is cleared. Namely, the previous part of the text that was confusing in relation to interpretation of criterion 1.3 and 4.8 are cleared by deletion of the unnecessary part of the criterion 4.8.</p> <p>The reason for these unclarity was basically due to use of term "forest conversion" on the Balkans. It is a term often used in change of the origin of forest, (for example from coppice to high forest) when certain degraded type of forest is cleared and other more productive or resistant type of forest species are planted</p>	<p>Update in 1.3</p> <p>Conversion of primary forests to forest plantations is strictly forbidden. It is prohibited to decrease the area of forest and forest land through conversion to other types of land use, unless in justified circumstances where the conversion is in compliance with:</p> <ul style="list-style-type: none"> a) national and regional policy and legislation applicable for land use and forest management, and is a result of government authorities planning and decision including consultations with materially and directly affected people and organizations and if conversion of forest area is lower of 1% in certified forest area; b) does not have negative impact on the threatened (including vulnerable, rare or endangered) forest ecosystems, culturally and socially significant areas, important habitats of threatened species and other protected areas; c) contribute to long-term conservation, economic and social benefits; d) does not destroy areas of significantly high carbon stock; <p>Update in 4.8.</p> <p>Traditional way of management of coppice forest can be conducted on appropriate habitats and in cases where it is ecologically, socially and economically viable.</p>

4	8.1.4 The standard requires that forest conversion shall not occur unless in justified circumstances where the conversion: e) makes a contribution to long-term conservation, economic, and social benefits.	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 b) entails a small proportion (no greater than 5 %) of forest type within the certified area; and c) does not have negative impacts on ecologically important forest areas, culturally and socially significant areas, or other protected areas; and d) does not destroy areas of significantly high carbon stock; and e) makes a contribution to long-term conservation, economic, and social benefits	The requirement for coppice forest is too general. It is unclear whether the law requires conversion to make a contribution to long-term conservation, economic, and social benefits; else it might also induce misinterpretation / interpretation disputes for conversion of coppice forests, as the relationship between clauses 1.3 and 4.8 is unclear	<p>Thee issue of requirement for coppice forests is cleared. Namely, the previous part of the text that was confusing in relation to interpretation of criterion 1.3 and 4.8 are cleared by deletion of the unnecessary part of the criterion 4.8.</p> <p>The reason for these unclarity was basically due to use of term "forest conversion" on the Balkans. It is a term often used in change of the origin of forest, (for example from coppice to high forest) when certain degraded type of forest is cleared and other more productive or resistant type of forest species are planted</p>	<p>Update in 1.3</p> <p>Conversion of primary forests to forest plantations is strictly forbidden. It is prohibited to decrease the area of forest and forest land through conversion to other types of land use, unless in justified circumstances where the conversion is in compliance with:</p> <ul style="list-style-type: none"> a) national and regional policy and legislation applicable for land use and forest management, and is a result of government authorities planning and decision including consultations with materially and directly affected people and organizations and if conversion of forest area is lower of 1% in certified forest area; b) does not have negative impact on the threatened (including vulnerable, rare or endangered) forest ecosystems, culturally and socially significant areas, important habitats of threatened species and other protected areas; c) contribute to long-term conservation, economic and social benefits; d) does not destroy areas of significantly high carbon stock; <p>Update in 4.8.</p> <p>Traditional way of management of coppice forest can be conducted on appropriate habitats and in cases where it is ecologically, socially and economically viable.</p>
5	10.1.1 The standard requires that when a nonconformity occurs, the organisation shall: a) react to the	Criterion 7.4. As part of internal regulation, the organization shall preapre complaint and appeal procedures for the forest management in	The clause requires forest management to prepare procedures which include description of	Proper modifications in the text of the criterion 7.4. were implemented.	<p>Update in 7.4.</p> <p>As part of internal regulation, the organization shall:</p>

	<p>nonconformity and, as applicable: i. take action to control and correct it; ii. deal with the consequences;</p>	<p>written. As part of it, the content shall provide:</p> <p>a) description of corrective actions if non compliance with the SFM standard is identified and the ways to deal with the consequences;</p> <p>b) instructions to investigate the cause for non compliances and proposal to take eventual measures to remove the cause and potential recurrence of non compliance;</p>	<p>corrective actions and ways to respond to nonconformities. However, the PEFC benchmark requires the Scheme to develop this, not the organisation. From the standard it must be clear that organisation shall react, take action and deal with the consequences when a nonconformity is raised.</p>		<p>a) react to the nonconformity and, as applicable:</p> <p>i. take action to control and correct it;</p> <p>ii. deal with the consequences</p> <p>As part of it, the content shall provide:</p> <p>a) the way organization reacts if non conformity appears;</p> <p>b) description of corrective actions and the ways to deal with the consequences;</p> <p>c) instructions to investigate the cause for non-conformities and proposal to take eventual measures to remove the cause and potential recurrence of non compliance;</p> <p>d) determining if similar nonconformities exist, or could potentially occur;</p> <p>e) instructions to take corrective measures that are in line with the level of identified non compliance and revision of efficiency of the measures;</p> <p>f) instructions for changes in the management system if that prove as necessary.</p> <p>All information that relates to appearance of non compliance, corrective measures taken and results from corrective measures shall be documented and archived.</p>
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