

No.	PEFC requirement	BFCS Standard & Document	Assessor's comment	Response submitted	Amendments to address NC (Incorporating feedback from PEFC)
<b>PEFC MK 03:2020 PEFC National Standard for Sustainable Forest Management in North Macedonia</b>					
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;	<u>Criterion nr. 1.3.</u> 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: 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%;	It is insufficiently ensured that the 1% will be of the forest type within the certified area.	Proper modifications in the text of the criterion 1.3. were implemented.	<b>Update in 1.3</b>  It is prohibited to decrease the area of forest and forest land 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: a) national legislation relevant for land use and is a result of government authorities planning and decision including consultations with affected stakeholders; 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;  The size of conversion of forest area shall not be higher of 1% of the forest type within certified forest area for a time period of 10 years.
2	8.1.5 The standard requires that afforestation of ecologically important non-forest ecosystems shall not occur unless in justified circumstances	<u>Criterion 1.3.</u> Increasing the forest areas through conversion of abandoned agricultural and bare lands into forest land shall be always taken in consideration whenever it enrich economic, ecological and	It is not ensured that afforestation of ecologically important non-forest ecosystems shall not occur unless it makes a contribution to long-term	Proper modifications in the text of the criterion 1.3. were implemented.	<b>Update in 1.3</b>  Increasing the forest areas through afforestation of abandoned agricultural and bare lands into forest land and afforestation of ecologically important non-forest

	where the conversion: f) makes a contribution to long-term conservation, economic, and social benefits.	social and/or cultural values. In areas where ecologically significant areas that not belong to forests exists, afforestation shall be implemented if it is in compliance with legislation and is part of planning processes, is not in breach with the interests of directly interested stakeholders, does not has negative impact to vulnerable, rare and endangered species that can be found in these areas and in the same time do not take more than 1% of the area of these non forest important areas and do not endanger areas where significant storage of carbon exists.	conservation, economic and social benefits. it is insufficiently ensured that 1.3 also covers all types of ecologically important non-forest ecosystems		ecosystems shall be always taken in consideration whenever it enrich economic, long-term conservation and social and/or cultural values. In areas where important non-forest ecosystems exists, afforestation shall be implemented only if: a) it is in compliance with national legislation and is part of planning processes; b) it is not in breach with regional/national policy; c) 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; d) 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; e) and in the same time do not take more than 1% of the area of these important non-forest ecosystems managed by the organization and do not endanger areas where significant storage of carbon exists. f) makes a contribution to long term conservation, economic and social benefits.
3	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	<u>Criterion 2.3.</u> During forest harvesting, skidding and transport in forests, the risk of oil spillage is strictly avoided and indiscriminate disposal of waste. Non-organic waste is collected (...) stored (...) and later on	The references include rules and measures meant to minimize the risk of oil spillage and waste disposal, however, the clause makes no mention of	Proper modifications in the text of the criterion 2.3. were implemented.	<b>Update in 2.3</b>  During forest harvesting, skidding and transport in forests, the risk of oil spillage is strictly avoided and indiscriminate disposal of waste. Non-organic waste is collected,

	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.	disposed on locations designated for that purpose. Indicators Indicator 1. Prescribed rules and measures for minimizing the risk of oil spillage and waste disposal are provided to conductors of forest operations and are implemented. Indicator 3. The existence of materials and absorbents for oil in the cutting area and in the forest machinery that is in use in forest operations."	emergency measures for when spillage has already taken place.		temporary stored on designated locations for this purpose and later on disposed on locations designated for that purpose. Forest managers shall develop and inform its staff and operators on the field on obligation to implement emergency procedures for minimisation of the risk of environmental harm arising from the accidental spillage of oil or fuel.
4	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;	<u>Criterion 7.4.</u> As part of internal regulation, the organization shall prepare complaint and appeal procedures for the forest management in written. As part of it, the content shall provide: a) description of corrective actions if non compliance with the SFM standard is identified and the ways to deal with the consequences; 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;	The clause requires forest management to prepare procedures which include description of corrective actions and ways to respond to non-conformities. 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	Proper modifications in the text of the criterion 7.4. were implemented.	<b>Update in 7.4</b>  As part of internal regulation, the organization shall: a) react to the nonconformity and, as applicable: i. take action to control and correct it; ii. deal with the consequences As part of it, the content shall provide: a) the way organization reacts if non conformity appears; b) description of corrective actions and the ways to deal with the consequences; 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; d) determining if similar nonconformities exist, or could potentially occur; 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>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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