

RESPONSE FORM - TPAC Stakeholder Forum



TPAC
Timber
Procurement
Assessment
Committee

Respondent	
Name:	Markus Brüttsch / Markus Pfannkuch
Organisation:	Precious Woods Holding AG
Country:	Switzerland
Date:	29.03.2019

Please select

Comments relate to:

- PEFC International
- PAFC Gabon**
- PEFC Indonesia
- PEFC Netherland
- PEFC Russia

Sustainable Forest Management (SFM)	
Legislation and regulation	P 1. Relevant international, national, and regional/local legislation and regulations shall be respected.
Required by PEFC ST 1003:2010, Criterion 5.7 and thus, entirely covered by Principle 1 of the PAFC Gabon SFM standard, version 2.2, June 2013	
Interests of stakeholders	P 2. The interests of directly and indirectly involved stakeholders shall be taken into account.
Covered by indicators 1.1.4 to 1.1.6 of the PAFC Gabon SFM standard, version 2.2, June 2013 Moreover, PEFC international requires that stakeholders must already be part of the development process for each national PEFC standard (PEFC ST 1001:2017)	
Health and labour conditions	P 3. Safety, health, and labour conditions shall be sufficiently safeguarded and where relevant enhanced.
Required by PEFC ST 1003:2010, Criterion 5.6.12 and 5.6.13 and thus, entirely Covered by indicators 1.1.7 of the PAFC Gabon SFM standard, version 2.2, June 2013	
Biodiversity	P 4. Biodiversity shall be maintained and where possible enhanced.
Required by PEFC ST 1003:2010, Criterion 4 and thus, entirely covered by Principle 3 of the PAFC Gabon SFM standard, version 2.2, June 2013, especially by Criterion 3.2, 3.3.1, 3.3.3, 3.3.4, 3.4, 3.5. From our perspective we do not understand why a standard should oblige a forest manager “to enhance biodiversity” if he is operating in natural forest under strict certification and SFM procedures. We believe that the duty of the forest manager is to guarantee the continuity of the existing biodiversity. If already deforest areas or degraded forest are located inside the scope of the certification – with the forest manager not the origin of this condition – we think that it is not necessarily his duty to reforest this area.	
Regulation functions	P 5. The regulation function and quality, health, and vitality of the forest shall be maintained and where possible enhanced.
Covered by Criterion 1, 2, 3 and 5 of PEFC ST 1003:2010 and thus, entirely covered by Principle 3 of the PAFC Gabon SFM standard, version 2.2, June 2013	

Production function	P 6. The production capacity of timber and relevant non-timber forest products shall be maintained.
Required by PEFC ST 1003:2010, Criterion 3 and thus, entirely covered by Criterion 2.2 and 2.3 of the PAFC Gabon SFM standard, version 2.2, June 2013	
Contribution to local economy	P 7. Forest management shall contribute to the local economy and employment.
Required by PEFC ST 1003:2010, Criterion 5 and thus, entirely covered by Principle 4 of the PAFC Gabon SFM standard, version 2.2, June 2013	
Management system	P 8. Sustainable forest management shall be realised through a management system.
Required to comply with PEFC ST 1003:2010, Criterion 1 to 5 and thus, entirely covered by Principle 2, especially criterion 2.1 and chapter 3.2.3 of the PAFC Gabon SFM standard, version 2.2, June 2013	
Management group	P 9. Forest management in a group or regional association shall offer sufficient safeguards for sustainable forest management.
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Chain of Custody (CoC)

Chain of Custody system	P 1. A Chain of Custody (CoC) must be in place from the forest unit of origin to the final point of sale, which provides a link between the certified material in the product or product line and certified forest units.
Covered by the PAFC CoC 2013 standard « Chaîne de contrôle des produits forestiers et à base de bois – Exigences PAFC », June 2013. This standard is based on PEFC ST 2002:2013.	
Chain of Custody group certification	P 2. If Group certification of the CoC is allowed, the standard must require that the group as whole must comply with the same requirements which are posed on individual companies.
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Logos and labels	P 3. Logos and labels that belong to the certification system and occur on products and documents shall have an unambiguous meaning and shall be applied in accordance with the rules established by the certification system.
The certificate number must figure on the PEFC logo on the product. The PEFC logo can only be used with a valid PAFC certificate and according to publicly available PEFC rules (PEFC ST 2001:2008). Each certificate has a specific Certificate Number that can be checked in the PEFC database (https://www.pefc.org/find-certified/certified-certificates)	

Development, Application and Management of certification systems (DAM)

Standard development	P 1. The process of standard development and the standard itself shall fulfil the requirements as established by international umbrella organisations (such as ISO and ISEAL).
The whole PEFC, and thus PAFC, framework is based on ISO standards:	
System manager	P 2. The certification system shall be managed by a legal entity (system manager). The tasks and responsibilities shall be clearly distributed among the organisations, which form an organisational and/or functional part of the system.
PAFC is organized as an NGO and a relatively young organization. It has strong technical support from PEFC International. The website of PAFC Gabon does still have some shortcomings. These issues have been addressed by Precious Woods and others and will be solved.	

Decision-making bodies and objection procedures

P 3. Decision-making bodies shall reflect the interests of stakeholders and shall provide for adequate procedures for objection and appeal regarding the decisions made and the functioning of the decision-making bodies.

PEFC international requires that stakeholders must already take part during the development of each national PEFC standard (PEFC ST 1001:2017) and stakeholders must always be consulted and have the right to complaint (PEFC ST 1003:2010).

Certification bodies and procedures

P 4. Certification bodies shall be independent and shall be competent to assess sustainable forest management and the chain of custody system.

In the PAFC 2013 standard for FM and CoC it is required that a certifying body is independent and impartial and must be accredited by COFRAC (French accreditation committee) or any other accrediting body that is a member of EA (European co-operation for Accreditation) or IAF (International Accreditation Forum).
The Precious Woods concession in Gabon has been audited by Bureau Veritas (accredited by COFRAC).

Accreditation

P 5. The accreditation agencies that grant the accreditations for certification of sustainable forest management and/or the chain of custody shall be competent and independent, national or international organisations that are preferably member of the IAF.

PAFC 2013 standard for FM and CoC asks certifying bodies to be accredited by COFRAC or any other accrediting body that is a member of EA or IAF.

The PAFC certificates of Precious Woods in Gabon have been issued by Bureau Veritas that has been accredited by COFRAC.

Procedure on endorsement of certification systems by a meta-system (PEM)

Processes of assessment and endorsement

P1 Processes of assessment and endorsement of Certification Systems are reliable and transparent.

Assured by compliance with PEFC international standards. Documentation of the process is publicly available on the PEFC international website¹.

General comments

1. In late 2018 the WWF released its Certification Assessment Tool CAT Assessment on the PAFC standard, ranking PEFC clearly behind the Forest Stewardship Council FSC standard. As a company certified against FSC and PAFC standards we were surprised about this result. During the certification process and the audits, we perceived both systems as nearly similar and very strict. We express several discontents with the PAFC CAT:

- PEFC was informed the day before the release and did not have enough time to respond.
- Several points have not been allocated to PAFC even if the requirements are fulfilled.
- The assessment only allocates full or zero points. A weighting of more and lesser important aspects, as it is common for such assessments, is not applied.
- Several requirements are not clear, ambiguous or one-sided. E.g. is ISEAL membership required but IAF is not accepted.

We strongly believe that the actual version of the CAT PAFC Gabon assessment needs to be independently revised and does not reflect the reality. We stay at your disposal if you need more information.

2. We do agree that the PAFC website needs to be improved and we are in contact with PEFC regarding that issue.

3. Several aspects of PEFC ST 1003:2013 Criterion 1, 2, 4 and 6 have not been included in PAFC Standard 2.2 2013 for various reasons, as they are not adapted to forest management conditions in Gabon²

¹ <https://www.pefc.org/standards/national-standards/endorsed-national-standards/34-Gabon>

² Sustainable forest management – PAFC Gabon standards requirements, Version 2.2, June 2013, p. 27

4. PAFC is much more rigorous and detailed than other certification schemes when it comes to fauna management
5. From our field experience, PAFC Gabon and FSC are on the same level.
6. The PAFC Gabon Standard 2013 is based on the PEFC international SFM standard 2010 (PEFC ST 1003:2010). When the PAFC Gabon standard will undergo its periodical revision in 2019, he will be based on the new PEFC international SFM standard 2018 (PEFC ST 1003:2018)