

RESPONSE FORM - TPAC Stakeholder Forum

TPAC

**Timber
Procurement
Assessment
Committee**

Respondent	
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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.
Covered by chapter 6.3 of PEFC ST 1003:2018	
Interests of stakeholders	P 2. The interests of directly and indirectly involved stakeholders shall be taken into account.
Stakeholders must already be integrated during the development of each national PEFC standard (PEFC ST 1001:2017). Direct stakeholder participation is one of the preconditions of PEFC ST 1003:2018, e.g. covered by chapter 4.2, 6.3.2. 8.1.4, 8.1.5, 8.1.6 of PEFC ST 1003:2018	
Health and labour conditions	P 3. Safety, health, and labour conditions shall be sufficiently safeguarded and where relevant enhanced.
Covered by chapter 6.3.3 and 6.3.4 of PEFC ST 1003:2018	
Biodiversity	P 4. Biodiversity shall be maintained and where possible enhanced.
Covered by chapter 8 Criterion 2 and 4 of PEFC ST 1003:2018 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 chapter 8 Criterion 1, 2, 3 and 5 of PEFC ST 1003:2018	
Production function	P 6. The production capacity of timber and relevant non-timber forest products shall be maintained.
Covered by chapter 8 Criterion 3 of PEFC ST 1003:2018	

Contribution to local economy	P 7. Forest management shall contribute to the local economy and employment.
Covered by chapter 8, especially its Criterion 6 of PEFC ST 1003:2018	
Management system	P 8. Sustainable forest management shall be realised through a management system.
Basic requirement of PEFC ST 1003:2018	
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 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 PEFC certificate and according to the publicly available PEFC rules PEFC ST 2001:2008). Each certificate has a specific Certificate Number that can be checked in the PEFC database ¹ .	

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 entire PEFC 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.
PEFC International, organised as a NOG with clear structures published on the pefc.org website.	
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.

¹ (<https://www.pefc.org/find-certified/certified-certificates>)

PEFC international requires that stakeholders must already be integrated 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.**

PEFC ST 1003:2018 requires certification bodies to be accredited by an accreditation agency that is an IAF member or member of a regional IAF group².

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.**

PEFC ST 1003:2018 requires accreditation agencies to be IAF member or in a regional IAF group³.

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.**

All PEFC international standards comply with ISO and ILO standards

General comments

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² PEFC ST 1003:2018, p. 7

³ PEFC ST 1003:2018, p. 7