

30 January 2009

Validation Report PEFC France

The Board of Experts declares that it has validated the PEFC France certification system for all its FMU's and the related Chain of Custody, against the criteria as laid down in the Keurhout Protocol for the Validation of Certification Systems, version May 31, 2006:



This report may only be issued integrally

The following documents have been included in the validation:

- French Forest Certification Scheme 2006-2011, French Forest Certification Association (FFCA), PEFC France, 12 October 2006. (FS)
 - Appendix 1 Brief Introduction to the French Forest-Wood-Paper Network (Ap1)
 - Appendix 2. Glossary and Acronyms (Ap2)
 - Appendix 3. List of Members- PEFC France (3 chambers) (Ap3)
 - Appendix 4. Articles to the French Certification Scheme, PEFC France (Ap4)
 - Appendix 5. Lisbon Guidelines, to draw up a site report and the Quality Policy of Sustainable Forest Management (this is an interpretation of PEFC PEOLG) (Ap5)
 - Appendix 6. Points to be respected when drawing up a Quality Policy of Sustainable Forest Management and Regulations. (Ap6)
 - Appendix 7. National Forestry Regulations (Ap7)
 - Appendix 8. Guidelines for carrying out internal audits (Ap8)
 - Appendix 9.a Translation of Annex 4 Chain of Custody of Forest Based Products- Requirements of PEFC Council Technical Document, 27 October 2006. (CoC)
 - Appendix 9.b. Translation of Annex 5 Regulations for use of the PEFC trademark , of PEFC Council Technical Document, 27 October 2006. (LU)
 - Appendix 10. Documents for the forest owner (o.a PEFC membership for forest owners) (Ap10)
 - Appendix 11. Documents for the forest managers (in fact these documents apply to contractors) (Ap11)
 - Appendix 12. Documents for businesses. (these documents apply to participants of the CoC) (Ap12)
- PEFC France Standard setting procedure (StP)
- Requirements for certification of conformity for SFM in accordance with the PEFC Standard, COFRAC (French Accreditation Committee), March 2007. (RSF)
- Requirements for certification of conformity for CoC in accordance with the PEFC Standard, COFRAC, March 2006. (RSC)
- PEFC Council Technical Document, 27 October 2006. (TD)
 - Annex 1, PEFC Terms and Definitions, 29 October 2004. (Def)
 - Annex 2, Rules for Standard Setting, 29 October 2004. (RSS)
 - Annex 3, Basis for Certification Schemes and their Implementation, 29 October 2004 (BSC)
 - Annex 4, Chain of Custody of Forest Based Products- Requirements, 17 June 2005. (CoC) Appendix 7 (to Annex 4), Guide to implementation of requirements for avoidance of the procurement of raw material from controversial sources 27 October 2006. (ConS)
 - Annex 5, PEFC Logo Use Rules, 27 October 2006.(LU)
 - Annex 6, Certification and Accreditation Procedures, 27 October 2006. (CAP)
 - Annex 7, Endorsement and Mutual Recognition of National Schemes and their Revision, 27 October 2006. (EMR)

Other materials integrated in the validation:

1. www.pefc.org
2. www.pefc-france.org
3. Politique Qualite de Gestion Forestiere Durable en Alsace 2007-2012, Juin 2007.
4. Cahier des cCharges du proprietaire forestier Alsacien engage dans la PQGFD, Juin 2007.
5. Rapport d'Audit' Ecopass. PEFC Alsace. Juillet 2007
6. Document cadre definissant les objectifs de la politique de gestion durable des forets d'Aquitaine. Juin 2007.
7. Référentiel Technique Régional de gestion durable pour la sylviculture, les travaux sylvicoles et l'exploitation forestiere. 2007.
8. Rapport d'Audit' AFAQ-AFNOR. PEFC Aquitaine. Juin 2007

GLOSSARY

BoE	Keurhout Board of Experts
CAP	Certification and Accreditation Procedures, (PEFC document).
CBD	Convention on Biodiversity
CITES	Convention on International Trade in Endangered Species
CB	Certification Body
CoC	Chain of Custody
COFRAC	French Accreditation Committee
CRPF	Regional Forest Property Centres (responsible for developing and steering the management of private forests)
EIA	Environmental Impact Assessment
EMR	Endorsement and Mutual Recognition of National Schemes (PEFC document).
EMS	Environmental Management System
EN	European Norm
FMU	Forest Management Unit
GFCC	France Forest Certification Council
GIS	Geographic Information Systems
ha	hectare
ILO	International Labour Organization
ISO	International Standards Organization
KH	Keurhout
KH-SYS	Keurhout Protocol for the Validation of Certification Systems
LU	PEFC Logo Use Rules (PEFC Document)
NC	Non-Conformity
NGO	Non-Governmental Organization
NTFP	Non-Timber Forest Products
NTTA	Netherlands Timber Trade Association
PEFC	Programme for the Endorsement of Certification Systems
PEFC-GE	PEFC Francey
PQGFD	Quality Policy of Sustainable Forest Management
RWG	Regional Working Group
SFM	Sustainable Forest Management
TD	Technical Document (PEFC document)
UNCCC	United Nations Conference on Climate Change
UNFF	United Nations Forum on Forests

1) Validation process

Between 2007 and 2008 Keurhout (KH) undertook a validation of the PEFC France system. The validation was implemented against the *Keurhout Protocol for the Validation of Certification Systems (KH-SYS)*, which was developed in 2005 by the Netherlands Timber Trade Association (NTTA) and latest amended 31 May 2006. The validation concerns the entire PEFC-France system (PEFC-FR) and covers the Sustainable Forest Management of 12 Forest Management Units (FMU's) with an extension of more than 3,9 million ha and a series of approximately 1,000 processing companies/units in the chain of custody (CoC).

The KH-SYS protocol consist of five parts. Part I is the Validation procedure, the other four parts are normative documents regarding SFM (Part II), CoC (Part III), Certification Bodies (Part IV) and the organisation and stability of the Certification System itself (Part V). The requirements are structured in the form of criteria with indicators grouped under various Principles. All criteria of the standards contained in Parts II to V are being assessed. Indicators serve as practical parameters to assess compliance with the criteria. Compliance with all criteria leads to a positive decision on the validation of the certificate.

In April 2007 the KH Board of Experts (BoE) received a formal request from a KH-participant to validate the PEFC France system at *system level*. From May/June 2007 a validation study took place which included a desk study of relevant documents and several communications with and a visit to the managing director of PEFC-FR. Through the desk study a detailed comparison was made between PEFC-FR documents and the requirements of KH-SYS. Additional questions were asked concerning aspects that were not clear or not well understood by the assessor(s) and a sample of regional certification cases (region Alsace, region Aquitaine) was studied in more detail.

2) PEFC France

PEFC France is certification scheme which has incorporated some of the normative documents of PEFC. The basic document is: French Forest Certification Scheme 2006-2011, French Forest Certification Association (FFCA), 12 October 2006. (FS)

It has twelve appendices. Besides there are the document for "Standard setting procedure" and the two documents specifying requirements for certification of conformity for SFM and CoC, "CEPE REF 22" respectively "CPS REF 16". These documents are complemented by the following PEFC documents to cover the full scope of the system.

- Annex 4, Chain of Custody of Forest Based Products- Requirements, 17 June 2005.
- Annex 5, PEFC Logo Use Rules, 27 October 2006.(LU) (French translation Ap 9b)

PEFC France comprises all the issues required for forest certification: requirements for forest management, CoC, and the accreditation and quality of external auditing. PEFC France has been endorsed by PEFC.

Organisation of PEFC France

The PEFC France is run by a registered association under the name of French Forest certification Scheme, which is also known as PEFC France.

Natural and legal entities can become members. Members are distinguished between forest owners, professional forest managers and contractors, and forest users, the latter include hunters, environmental NGO's. The members belong to one of the three chambers of the General Assembly. The executive bodies of the association are the General Assembly (GA), French Forest Certification Council (FFCC) which is in fact the Board of Directors. The GA votes on budgets and passes accounts, approves and excludes membership and approves the PQGFD's . The Board administrates the PEFC France and elects an Executive Committee (EC), which is chaired by the President. The President is the organization's legal and public representative. The EC appoints the Managing Director. The operational office is in Paris.

Standard setting and revising

Development (or revision) of the PEFC France scheme, including the SFM standard documents Appendix 5, 6, and 7, is lead by a working group composed of the Board of PEFC France associated with experts. This group is placed under the authority of the Chairman of PEFC France. This group produces a first draft submitted to the “Conseil d’Administration” of PEFC France for adoption. The draft hence adopted is then submitted at the same time to three processes:

- examination by a panel of interested parties (through a written process) for advice ;
- public consultation for a period of two months (through PEFC France’s website)
- field trial by two different candidates to forest certification.

Based on this wide consultation, the scheme hence developed (or revised) is submitted to the Extraordinary General Assembly of PEFC France for adoption.

All the contributions made by consulted parties for the development (or the revision) of the French forest certification scheme are kept by the secretariat of PEFC France.

The present procedure is publicly available and downloadable from the website of PEFC France. The French forest certification scheme is revised every 5 years.

Appendix 5 to the French Forest Certification Scheme 2006-2011, provides the framework for drawing up a site report and the Quality Policy of Sustainable Forest Management (PQGFD), by the applicant for certification. Appendix 6 introduces points to be respected by the applicant when drawing up these documents. Appendix 7 contains guidance and prescriptions to be adhered to by professional forest bureaus and contractors. The main document “The French Forest Certification Scheme 2006-2011” sets out procedures for drawing up the site report and the PQGFD to be followed by the applicant. The GA approves the PQGFD.

Each of the points mentioned in Appendix 5 should be discussed by the members of the applicant for certification. If the discussion does not identify a pertinent objective for a given point, documentary evidence of the discussion must provide the reason for not including the point. The GA approves the PQGFD, which then becomes the basis for conformity assessment by a certification body.

Certification process

Applicants for certification can be: *Regional Entity (RE)*, which is a regional association with a corporate status; *Group* or an *individual forest owner*. In practice Regional Entities are the applicants. In this respect the preamble of the French Forest Certification scheme document states “recognition of the regional level (administrative region or group of several regions) as the most relevant geographical area of application, particularly as it is the most suitable level at which to bring together the main partners involved in this strategy, and enables the specific problem posed by the subdivision of land and a large number of landowners to be addressed. Presently 15 regional and 1 group certificate have been issued.

Each RE, benefiting as it does from corporate status, is organised into chambers under the same terms of reference as PEFC France. Forest owners who join the scheme must give an undertaking to comply with the provisions of the regulations of the RE, including the PQGFD, under the terms of Appendix 10. The RE must comply with elaborated procedures for implementation and monitoring as contained in the main document of the French Forest Certification Scheme.

The RE applies for certification with the GA while submitting its site report and PQGFD for approval. The GA decides on the choice of the certification body which is accredited by the national French Accreditation Authority (COFRAC), in accordance with a specific programme, titled CEPE ref. 22. based on ISO EN 45012.

Only timber from the forest of participating forest owners in the RE certification can be considered as coming from certified forests.

4) Results of the validation

The system has been assessed against the four normative documents of the Keurhout System validation process.

The summary of the findings of the Board of Experts is presented below. Under each Principle (P) the assessment of the related criteria is briefly summarized. (Acronyms in brackets refer to documents listed in chapter 1). This summary is captured in an overall validation per Principle with the following indication:

- OK = Satisfactorily addressed
- OK - = Minor deficiency
- = Major deficiency

Validation Part II a: Requirements regarding the forest management system.

P 1 OK	The organisation responsible for the management of the forest shall act according to the law.
Three criteria come under this principle. The criteria regard legal entity, registration, the right to harvest and royalties and fees. The French legislative system covers the criteria sufficiently. (Ap 4)	
P 2 OK-	The organisation responsible for the management of the forest shall have an adequate forest management system.
Seven criteria come under this principle. Criteria regard a responsible management body; a clear forest management unit; commitment to long term objectives; complying with (international) legislation; management plan; qualified trained personnel; and the operation of a forest management system. Most are considered to be fulfilled satisfactorily. The management system operates at the regional level. The management of forest holdings is monitored through the regionally operating monitoring system. (Fs, Ap 5, 6, 7, 10 and 11). Apparently individual holdings are not required to have a management system in place. The BoE considers this acceptable for smaller companies (e.g. up to 50 or 100 ha). Therefore a condition is formulated.	

Conclusion:

Based on the above observations requirement Part II.a is considered to be sufficiently met, provided the following condition will be complied with:

Condition 1: *a requirement for a management process (plan, do, check, improve) for forest holdings with a minimum size of 50 or 100 ha will be incorporated in the standard at the next standard revision.*

Validation Part IIb: Requirements regarding the forest management performance.

P 1 OK	The regulatory functions of the forest shall be preserved.
Four criteria. The criteria set requirements for maintenance of soil quality, quality and quantity of ground and surface water, watershed management and erosion prevention. PEFC France addresses these criteria adequately. (Ap 5; Ap 6; Ap 7)	
P 2 OK	The biodiversity of the various ecosystems shall be preserved.
Three criteria. Criteria under this principle focus on identification of main ecosystem and species; protection and management of special ecosystems and red list species; monitoring the impact of management activities on the residual stand. PEFC France addresses these criteria sufficiently. (FS 1.5; Ap 5)	
P 3 OK	Adverse side effects, resulting from forest management, shall be prevented.
One criterion. The criterion requires social and environmental impact assessments. These assessments are not explicitly required by PEFC France. The need for SIA's and EIA's however appears less relevant in the PEFC France context. A great deal of information must be collected anyhow to fulfil all the PEFC France criteria. The BoE considers the criterion therefore to be sufficiently addressed.	
P 4 OK	The timber production capacity of the forest shall be preserved.
Four criteria. Criteria set requirements for the maintenance of harvest and management data; preservation of natural regeneration capacity; and implementation of appropriate silvicultural and harvesting systems; and minimizing harvesting damage to the residual stand, seedlings and soil. These items are well being covered by PEFC France. (Ap 5; Ap 6; Ap 7)	

P 5 OK	The production capacity of non-timber forest products (NTFPs) shall be preserved.
<p>Three criteria.</p> <p>Criteria refer to the management of data on NTFP's, stimulation and development of local processing of NTFP's.</p> <p>PEFC France requires that actions are taken to facilitate the creation and expansion of processing companies as well as the use of forest products. Measures are taken so that harvests do not exceed the forest's production capacity (<i>mushrooms, cork, other harvested forest products</i>) The BoE is of the opinion that management of data is implicit to measures which prevent excess harvest. The BoE considers that Principle 5 is being covered sufficiently.(Ap 5)</p>	
P 6 OK -	The participation of the local population shall be ensured.
<p>Three criteria</p> <p>They refer to stakeholder consultation and participation; profit sharing; and knowledge about rights and responsibilities of the stakeholders.</p> <p>Criterion about profit sharing is considered to be not applicable in the French context. The rights and the responsibility of stakeholders are (implicitly) addressed by PEFC France. The requirement of consultation of stakeholders is limited to the regional level for the Quality Policy of SFM report and is not explicitly required for the FMU, for instance for the development of a forest management plan. Besides, there seems to be no guarantee that all relevant stakeholders will be invited at the regional level (Ap 5 and 6). Therefore a condition is formulated.</p>	
P 7 OK	The social and economic well being of the local population and employees shall be ensured.
<p>Four criteria.</p> <p>The requirements regard job opportunities for the local population; international level working conditions; training, health and safety; and knowledge about legal instruments regarding these issues. The criterion regarding job opportunities for the local population is regarded as not relevant in the French context. PEFC addresses the other criteria satisfactory. (FS; Ap 5 and 7)</p>	
P 8 OK	Socio-cultural forest functions and utilisation by indigenous and other people living in and around the forest shall be respected.
<p>Four criteria.</p> <p>The criteria pertain to respecting traditional land use rights; traditional use of NTFP's; religious or cultural areas; and maintenance of aesthetic value. The BoE considers the explicit requirement for respecting traditional use rights for land and NTFP's not opportune in the French context. PEFC France requires respect to Religious and Cultural areas, and integration of different forest uses, including landscaping aspects, into sustainable development documents and take them into account during implementation. (Ap 5, Ap 6)</p>	
P 9 OK	Negative social impacts caused by forest exploitation shall be reduced.
<p>One criteria.</p> <p>The criterion concerns compensation for damaged property. French legislation arranges damage claims and compensation. Therefore inclusion of such a criterion in the French standard would be redundant.</p>	

Conclusion:

Based on the above observations, requirement Part II.b is considered not to be fully met, mainly because consultation and participation of stakeholders (P 6) seem to be weakly covered. Requirement II.b is considered to be sufficiently met, provided the following condition will be complied with:

Condition 2: *a requirement for stakeholder consultation for forest holdings with an area of 100 ha or above will be included in the standard at the next revision.*

Validation Part III: Requirements regarding the chain of custody

P 1 OK	The timber shall be traced and monitored from the moment of felling through all its possible stages of processing and transport up to the moment of being imported in the EU.
<p>Five criteria. The main issues are: parties in the CoC have a certified management system according to ISO norms, This implies the registration and documentation of production, processing, storage, transport and sales and the distinguishing between certified and non-certified timber products. In case of mixed products the certified products should at least be mixed with timber(products) from legal origin. PEFC requires that the organisation's verification programme shall include on-site inspections of suppliers delivering "high risk" supplies. PEFC France has included the PEFC requirements as to CoC and the use of the PEFC logo. These requirements comply with the Keurhout criteria (CoC; ConS).</p>	

Conclusion:

Based on the above observations, requirement Part III is considered to be fully met.

Validation Part IV: Requirements regarding the certifying body

P 1 OK	The certification body shall be able to demonstrate that it is capable of assessing forest management and the management system and/or the Chain of Custody.
<p>Seven criteria. The first three criteria concern the expertise and independence of the CB. These criteria are implicitly met as PEFC France requires CB'S to be accredited by COFRAC for SFM and comply with ISO Guide 66, 19011 and 14001 and for CoC and comply with ISO guide 65.</p> <p>The following four criteria refer to assessment scheme. They address audit procedures including the identification of relevant legislation and existing (customary) rights and requirements for the audit report. The BOE is of the opinion that all these requirements are covered through the accreditation by a national accreditation body (FS; RSF; RSC).</p>	

Conclusion:

Based on the above observations, requirement Part IV is considered to be fully met.

Validation Part V: Requirements regarding the certification system

P 1 OK	The organisation management shall clearly act independently.
<p>One criterion. The criterion requires that the CS shall be managed by an organisation that is properly structured and contactable. PEFC-France is registered, according to the law, as an association, AFCF (French Forest Certification Scheme) which is also known as PEFC France. (Ap 4)</p>	
P 2 OK	The system manager shall be responsible for the quality and monitoring of the Certification System.
<p>Nine criteria. Criteria address: the establishment process of the system; the procedures to implement the system; setting requirements for forest mangers, CoC partners and CB's; procedures to monitor compliance with requirements imposed by the system; the access to certification reports; appeal procedures against decisions by the certification body; access to information on the certification system. PEFC France addresses these criteria satisfactorily. (FS plus Appendices 1-12; PEFC documents)</p>	

P 3 OK	The development process of the generic standard, regional and national standards and the standard for the chain of custody shall be fair and transparent.
Two criteria. The criteria pertain to fair transparent standard setting and field testing. PEFC has elaborated Rules for standard Setting, including the requirement to define written procedures and to undertake field testing. PEFC France satisfies these criteria (StP)	
P 4 OK	The universal standard and the regional and national standards for Sustainable Forest Management and the standard for the Chain of Custody shall be supported and formally accepted by the system manager.
Two criteria. The criteria refer to documented procedures for accepting a standard and interpretation documents; transfer of all elements of the universal standard into the national standard. PEFC France requires that standard revisions shall be participatory, fair and transparent. There is no reference to interpretation documents. BoE considers that standard revision and assessing procedures contain enough guarantees for a consistent interpretation. PEFC French standard is based on the generic PEFC standard and includes the relevant criteria. (StP; RSS; EMR) PEFC French has written procedures for accepting and revising the SFM standards. (FS TD 4.2)	
P 5 OK	The standard shall be clearly structured, complete, usable and allow for objective assessment.
Three criteria. The criteria refer to the suitability to apply the standard at the FMU level; consistency in terms of structure and reasoning; and compatibility with national and international laws. The BoE is of the opinion that the PEFC standard for France is rather complex. Each region adds its own interpretation to the standard (FS; Ap 5, 6, 7 and 10), which allows for consideration of the local context.	
P 6 OK	Certification Bodies shall comply with international accepted standards of professionalism and independency.
Three criteria. The criteria require the CS to set requirements as to the status (accreditation) and professionalism of CB's and the procedures they follow. (In fact, these criteria reflect the Keurhout standard for CB's as contained in Part IV). PEFC France addresses these criteria satisfactorily (FS;RFS;RFC).	
P 7 OK	Group Certification shall be based on compliance with the performance standards for individual forest management units, respectively CoC participants, and in addition specific requirements regarding group organisation and management.
Three criteria. The criteria require that the Group Certification system specifies the tasks and responsibilities of the group leader and that the standard imposes requirements for the management system and the expertise of the group leader. The management system should meet requirements equivalent to those of ISO 9000 or ISO 14001. PEFC France requires that the group puts in place a quality management system (in accordance with the ISO 9000 norm) or an environmental management system (in accordance with the ISO 14000 norm) as a methodological basis for its PQGFD. PEFC France documents do not refer explicitly to responsibilities of the group leader. However, specifications are required by the ISO guidelines (FS; RFS;RFC). The criteria are considered to be satisfactorily addressed.	

Conclusion:

Based on the above observations, requirement Part V is considered to be met in spite of two minor deficiencies, being the lack of reference to interpretation documents (P 4) and the complexity of the standard (P 5)

Overall conclusion:

In general it is observed that all four normative parts of the Keurhout System are generally well covered by the requirements of the PEFC France system. There are a few minor deficiencies pertaining to: the complexity of the standard (Part V, P5); insufficient insight in the tasks and responsibilities of the group leader; and most important limited clarity about procedures for stakeholder consultation at the regional and FMU level (Part II b, P 6)

Summary of Principles with deficiencies

Part	OK	OK -	-
II a	P 1	P 2	
II b	P 1; 2; 3; 4; 5; 7; 8; 9	P 6	
III	P 1		
IV	P 1		
V	P 1; 2; 3; 4; 5; 6; 7		

The BoE **accepts** the PEFC France system on the basis of the studied documents which constitute the system under the following conditions:

Condition 1: a requirement for a management process (plan, do, check, improve) for forest holdings with a minimum size of 50 or 100 ha will be incorporated in the standard at the next standard revision.

Condition 2: a requirement for stakeholder consultation for forest holdings with an area of 100 ha or above will be included in the standard at the next revision

And further:

Keurhout considers it the responsibility of PEFC France. to provide Keurhout with full copies of surveillance audit reports, related to the RE's, groups and FMU's and related CoC, whenever requested.

Further, PEFC France shall inform Keurhout at least one month in advance on any changes of its standards as well as of changes in relevant legislation and/or regulations.

PEFC France shall provide Keurhout once every six month's with an up-dated overview of all valid certificates and of the companies that comply with the additional KH-CoC conditions.

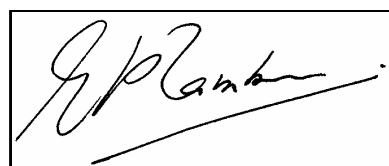
Failure to do so may result in suspension of the admission to the Keurhout Sustainable system.

Date: January 30th 2009

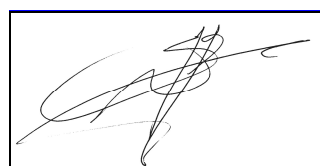
Signed:

Ir. E.P. Zambon

Prof. C.J. Jepma



(Secretary)



(Chairman)