

Review Of The World Bank/WWF Alliance Questionnaire For Assessing The Comprehensiveness Of Certification Schemes/Systems (QACC, Version 1.0, March 2003)

Response to comments from the PEFC Council

September 20, 2004

QACC No.		QACC Criterion/Questions	PEFCC Comment	Alliance Response
1.1		Clear and explicit objectives that are consistent with Alliance goals for forest conservation and sustainable use	<p>a) The interpretation of “clearly require” repeated in all sub-questions would need to be clarified in the explanatory note. In many cases the individual elements may be implicit but still strongly present.</p> <p>b) Applying such a text in a rigid way would risk leading to unnecessary and often costly revisions of many existing standards in spite of the fact that these elements are already covered, albeit in an indirect way.</p>	<p>Not Accepted -</p> <p>a) Clarity is best achieved by having explicit elements rather than implicit ambiguities. However the criterion requiring clear and explicit objectives allows appropriate scope for an experienced assessor familiar with certification procedures to judge if the “element” in question is “implicitly but still strongly present”</p> <p>b) The need to change standards would only arise if technical support was solicited from the Alliance to improve or update the standard in question. In practice, the QACC will only be applied after this testing phase to assess requests for technical assistance or progress against the Alliance’s target where one of the two partners have made investments to improve forest management.</p>
	1.1.2	Does the scheme/system clearly require the definition, documentation and legal establishment of long term tenure and use rights to land and forest resources?	It needs to be pointed out that 1.1.2 will be problematic in many developing country conditions and serves in fact as hurdle to certification of many community forests. Applying a global norm in this field would act against these countries.	Accepted - This illustrates the challenge discussed above with how to assess explicit and implicit “elements.” The equivalent wording in the World Bank’s Operational Policy on Forests (OP4.36 – para 10b) overcomes this potential ambiguity

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				address). Modify this question to read <u>“Does the scheme/system require recognition of and respect for any legally documented or customary land tenure and use rights”</u> .
	1.1.4	Does the scheme/system clearly require the maintenance and enhancement of the long term social and economic well-being of forest workers and communities?	Question 1.1.4 should be clarified. In a global economy, it will be difficult to maintain employment levels and not use advanced technologies (which almost by definition substitute labour for capital). The literal interpretation of this question may encourage extended poverty and producers falling out of the market economy.	Accepted - Modify question to read: <u>“Does the scheme clearly require recognition and respect for the rights of workers and the maintenance and enhancement of the long term social and economic well being of forest communities?”</u> This will then reflect the equivalent wording in The World Bank’s Forest Operational Policy 4.36 (10.b), which addresses workers, indigenous peoples, land tenure and resource use rights.
	1.1.7	Does the scheme/system clearly require forest operations to be located in areas that do not threaten or have a significant impact on critical forest conservation areas?	Question 1.1.7 refers to “critical forest conservation areas”; elsewhere the term “high conservation value forest” is used. These are not internationally recognized or defined terms and there is a need to define and agree these kinds of terms if they are used.	Not Accepted - These terms are defined in the respective operational policies of the Alliance partners (see World Bank Forest Operational Policy 4.36, Annex A; WWF Position Paper on HCVF, March 2002; and corresponding HCVF toolkit).
	1.1.8	Does the scheme/system clearly require management systems to maintain a comprehensive and up to date management plan, appropriate to the scale and intensity of the operation concerned?	Question 1.1.8 is weakly formulated. It should be made clear that all the elements in this question refer to certification standards. They are not general in the sense dealing with accreditation or certification process as suggested in the preamble.	Accepted - Modify question to incorporate wording from World Bank’s Forest Operational Policy (para. 10g) for clarity. Question to read: <u>“Does the scheme/system require effective forest management planning though the maintenance of a comprehensive and up to date management plan appropriate to the scale and intensity of the operation concerned?”</u>

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2.1		Compliance with relevant local and national laws and regulation and with international agreements the country has signed	The concept of international law should be clarified in this context.	Not Accepted - If a country is a signatory to an international agreement, the context is clear. Furthermore the World Bank Forest Policy OP 4.36 (para. 6) explicitly states that "The Bank does not finance projects that contravene applicable environmental agreements"
2.2	2.2.2	Are there mechanisms to adapt costs of certification to small forest owners, communities and other groups that may have limited access?	<p>The explanatory note implies that certification schemes are responsible for research (in this case on small-scale forest owners and communities); it is obvious that this has nothing to do with the quality of certification systems. The audit guideline in Annex III is too narrow to be practical.</p> <p>ISO Guide 61 (ch. 2.1.2. o) requires that an accreditation body shall not be involved in services to design, implement or maintain a certification scheme. The accreditation body therefore does not influence whether or not special procedures exist to allow small forest owners' access to certification as it only guarantees that the requirements for certification and accreditation are applied in non-discriminatory manner.</p> <p>The certification and accreditation bodies are not permitted to design the certification schemes and therefore the question is irrelevant for certification and accreditation section of the questionnaire.</p>	Not Accepted – The explanatory note asks simply if the scheme has procedures to overcome barriers to access by small forest owners, communities or other disadvantaged groups. This is a fundamental issue for testing the equity and relevance of the scheme/system being evaluated.
2.3	2.3.2	Are there mechanisms and	Question 2.3.2 will be irrelevant for many	Accepted - The focus should be on

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	<p>processes in place to facilitate the harmonization/equivalence of national Standards and processes within the scheme/system?</p> <p>(Applicable for standards, standardization and accreditation)</p>	<p>independent schemes developed at the national level and its justification has to be questioned, particularly in the way it has been formulated (e.g "within the scheme/system" implies self-harmonization).</p> <p>The explanatory note (in this and many other cases) makes a reference to the TBT Agreement and ISO Guides. It would be appropriate to use the exact language of the relevant documents and provide the context to help the reader understand the implications.</p> <p>Question 2.3.2 is also irrelevant for the accreditation process. The scope of accreditation (see ISO Guide 2 and 61) does not include "harmonization of national standards".</p> <p>d) The harmonization of the accreditation process, which is provided by official national accreditation bodies, is ensured through the use of international standards and documents (ISO Guides 61, 62, 65, 66) and through multilateral agreements amongst accreditation bodies within organizations such as IAF (International Accreditation Forum) and EA (European co-operation for Accreditation).</p>	<p>the harmonization of standards and processes within international schemes.</p> <p>Appropriate citations to be included in guidance note 2.3</p>
2.5.1	<p>If there are multiple bodies or groups setting forest management standards in the same area, do they cooperate?</p>	<p>Is competition between schemes ruled out as suggested by question 2.5.1?</p>	<p>No. International trade agreements require the harmonization of standards and conformity procedures to avoid adverse impacts on free trade, except where this would be ineffective or inappropriate. This question provides an explicit check whether measures for appropriate harmonization are in place.</p>

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2.5.2	Are international standards used (in a hierarchical manner) in the development of regional, national or sub-national standards?	<p>d) Question 2.5.2 is irrelevant in the way it is formulated, as there are no international forest certification standards at present. For example, the FSC P&C and PEOGL are not standards.</p> <p>d) As a corollary, question 2.5.3 becomes redundant.</p>	<p>a) Not Accepted - FSC P&C and PEOGL, among other international C&I, do not qualify as international standards per se according to ISO and WTO definitions. However any forest certification scheme/system should certainly take such frameworks into account as a matter of good practice. We accept, however, that the question could be better formulated to make explicit reference to international P, C&I rather than “standards,” and will refer this to the field test and review panel.</p> <p>b) Not Accepted - per response to (a) above.</p>
2.6	Participation in the work of relevant international standardizing bodies	The relevance of these questions is questionable as there is no official international standardization body (e.g. ISO) which has developed, or is working on the development of an international forest management standard.	Not Accepted - WTO Code of Good Practice (appendix 3, F & H) and ISO/IEC Guide 59:1994 encourage standard setting bodies to avoid duplication. This criterion provides an explicit element to assess conformity with the spirit and intent of this objective in relation to existing international processes regarding forest principles, criteria and indicators.
2.7	Provision of draft standards to interested parties, nationally and internationally, and taking of comments into account	The questions under chapter 2.7 are irrelevant to accreditation bodies as ISO Guide 61 (ch. 2.1.2. o) requires that the accreditation body shall not be involved in services to design, implement or maintain a certification system/scheme	Accepted – Will only apply to the standards column.
2.7.4	Is the rationale for accepting or rejecting comments documented	Question 2.7.4 appears to imply a more laborious effort than is currently applied in	We agree. However the question is consistent with World Bank best

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	and retained?	setting standards under the ISO system.	practices in regards to transparency and meaningful participation.

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3.1	Meaningful participation in decision making by a wide range of stakeholders, including consumers, producers, conservation and social NGOs, community-based organizations, etc.	The appeals procedure in accreditation and certification is considered here as part of the decision making while it is separately to be reviewed under question 3.9.	There is no mention of appeals procedure here in 3.1
	3.1.2 Are all major groups represented at the body's meetings?	In 3.1.2 the term "major group" would require definition if it were to be used.	Accepted - "Major group" is a term widely used in UN meetings such as the UNFF, and their sessions always have provisions for a multi-stakeholder dialogue with major groups. For purposes of clarity in the QACC, major groups will be defined as those listed in 3.1.3.
	3.1.3 Have each of the following stakeholder groups participated in the development of the system (accreditation and/or standard setting) a) as a consultative body? 3.1.3.1 The Government? 3.1.3.2 Donor/financing agencies? 3.1.3.3 Environmental NGOs?,...	a) Question 3.1.3 suggests that the scheme should ensure that all the groups participate in the development of a certification system. However, this is not always possible as participation is voluntary and cannot be imposed. Some groups may not participate as they have no extra resources or they consider the process irrelevant, or of marginal importance to them. b) Furthermore, it is difficult to see any justification why all the stakeholders should participate in the development of accreditation systems.	a) We agree. However the question is consistent with ISO Guide 59:6.1 that participation in a standardization process at all levels shall be accessible to materially and directly interested persons and organizations within a coherent process. Principle 10 of the Rio Declaration & related Forest Principles also affirm access to public information and decision-making processes. b) Accepted – question will only be applied to standard setting and

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3.1.4	<p>3.1.4 Have each of the following stakeholder groups participated in the development of the system (accreditation and/or standard setting)</p> <p>b) as a decision-making body?</p> <p>3.1.4.1 The Government?</p> <p>3.1.4.2 Donor/financing agencies?</p> <p>3.1.4.3 ENGOs?,...</p>	<p>c) If stakeholders are to be divided into groups, "the players at different stages of the processing / distribution chain" should be broken down in the same way as the other groups.</p> <p>d) The important issue of representativeness of participation has not been spelled out in question 3.1.</p> <p>e) The representation of interested parties in accreditation and certification processes is governed by ISO Guide 61, 62, 65 and 66. The QACC should use the approach defined by this international documents instead or reinventing the wheel and setting its own requirements.</p>	<p>schemes columns.</p> <p>c) Accepted</p> <p>d) Accepted, with modification - No selection system can guarantee representativeness to all parties. However, representativeness can be best assured by the participation of major groups and transparency of the processes per criteria 3.2, 3.7, 3.8 and 3.9 which we chose not to repeat here.</p> <p>e) Not Accepted - Original question is consistent with World Bank best practices with regard to transparency and meaningful participation (which exceed ISO minimum thresholds).</p>
3.2	Equitable participation in decision making	The questions for participation should follow the internationally accepted rules for standardization (ISO Guide 59).	Accepted, with comment - Criterion is consistent with World Bank best practices (which exceed ISO minimum thresholds).
3.2.3	Have all stakeholder groups the same decision weight in setting the thresholds (minimum requirements) in the standard?	<p>a) Question 3.2.3 is one of the value-laden questions of the questionnaire suggesting in this case that various stakeholder groups should have the same weight in setting the thresholds of the standard. See the comment above concerning the need to define stakeholder groups (see 3.1.2). In question 3.1, five stakeholder groups have been identified suggesting that there may be more, with obviously each having 20 % or less weight in decision making. This cannot be practical.</p> <p>b) The approach of using same weight for groups differs from the practice (2/3 majority in voting) which is referred elsewhere in the</p>	<p>a) Accepted - Equitable participation in decision making is an essential value if any certification scheme/system is to have stakeholder credibility. If indeed this is practical or not is one of the issues to be addressed in the QACC field test and review process.</p> <p>b) Not Accepted - The reference to consensus (defined by ISO as 2/3rd majority vote) refers to decision making of the body in question. The approach in question 3.2.3 refers to the relative voting weight between</p>

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		document.	different stakeholder groups within the body, not individual members.
3.3	<p data-bbox="218 358 289 383">3.3.2</p> <p data-bbox="323 358 707 477">Does the standard have special provisions, beyond the requirements of applicable legislation, for:</p> <p data-bbox="323 496 707 615">(Management of biodiversity in production forest? Management of high conservation value forests? The use of GMOs?, ...)</p>	<p data-bbox="753 358 1312 691">Question 3.3.2 overlaps with question 1 and its justification can be questioned, as the list of “special provisions” is subjective. If the additional points are supposed to add value at an international level, they should be properly identified and worded. The terms “invasive species”, “clear cutting”, “use of chemicals”, “conversion”, etc. if they are to remain, should be reworded (e.g. control of alien species, harvesting methods, control of impact of chemicals on soil and water, etc. as examples).</p>	<p data-bbox="1352 358 1801 570">We accept that there is some overlap. However test 1 is designed as a first filter to assess general questions about the system/scheme as a whole and does not differentiate between standardization, certification and accreditation as do tests 2, 3 & 4.</p> <p data-bbox="1352 589 1801 862">We do not accept that the list of special provisions is subjective. Rather this list deals with forest management issues of key concern to a broad range of stakeholders. The ability and robustness of a scheme/system to address these issues is central to a test of stakeholder credibility.</p> <p data-bbox="1352 881 1801 967">Recommendations on the use of terminology will be sought during the field testing and review process.</p>
	<p data-bbox="218 989 289 1013">3.3.3</p> <p data-bbox="323 989 728 1107">Are there procedures to assess field implementation against special provisions in the standard, for:</p> <p data-bbox="323 1127 728 1245">(Management of biodiversity in production forest, management of high conservation value forests? The use of GMOs?, ...)</p>	<p data-bbox="753 989 1312 1138">Question 3.3.3 is unnecessary as in every certification system the standard requirements (including field implementation) are assessed in certification audits anyway. Furthermore, some of the listed items are not FMU level issues.</p>	<p data-bbox="1352 989 1801 1170">Not Accepted - While one would hope that all performance- and system-based standard requirements would be assessed in every audit, it seems only prudent to verify that this happens in practice.</p> <p data-bbox="1352 1190 1801 1333">While some of the special provisions may have dimensions that extend beyond the FMU, we believe that all are important issues to be considered at the FMU level.</p>
	<p data-bbox="218 1357 289 1382">3.3.4</p> <p data-bbox="323 1357 707 1411">Is there a reference to the Precautionary Principle (PP) in</p>	<p data-bbox="753 1357 1312 1411">a) In question 3.3.4 reference to procedures is unnecessary. Furthermore, it is unclear what is</p>	<p data-bbox="1352 1357 1801 1411">a) Not Accepted - While we agree that the Precautionary Principle</p>

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	the standard and/or procedures?	<p>to be assessed here and on what basis. Any standard setting process should naturally apply the Precautionary Principle but whether it should be explicit to be auditable is questionable.</p> <p>b) The questions are irrelevant for accreditation and certification as both activities shall not be involved in the designing, implementation and maintenance of certification schemes / systems (see comments to 2.7).</p>	<p>“should” naturally apply in any standard setting process, it seems only prudent to verify that this happens in practice, both in the development of the standard and in the assessment of conformity to the standard. This is particularly relevant given the Alliance’s Principles and our corresponding objectives with regard to “critical forest areas” and “high conservation value forests” (see response to 1.1.7 above).</p> <p>b) Not Accepted - The question does not imply that either accreditation or certification activities are involved in the design, implementation or maintenance of the schemes/system. It merely asks whether there is reference to the Precautionary Principles in the various steps of the certification process. It seems only prudent to verify that this happens in practice, both in the development of the standard and in the assessment of conformity to the standard. However the accreditation column will be blocked accordingly.</p>
3.4	Recognition of indigenous people, local communities and worker’s rights	The questions are irrelevant for accreditation and certification as both activities shall not be involved in the designing, implementation and maintenance of certification schemes / systems (see comments to 2.7).	Not Accepted - The question does not imply that either accreditation or certification activities are involved in the design, implementation or maintenance of the schemes/systems. It merely asks whether there is reference to the recognition of indigenous people, local communities and worker rights

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			in the various steps of the certification process. It seems only prudent to verify that this happens in practice, both in the development of the standard and in the assessment of conformity to the standard. However the accreditation column will be blocked accordingly.
3.4.1	Are there provisions in the standard that explicitly recognize all of these rights?	In question 3.4.1 there is a reference to “all” rights, which appears to go beyond the objectives of forest certification. Elsewhere the term “legal and customary” rights are used which would be more appropriate here as well.	Not Accepted - This appears to be a misinterpretation of grammar. 3.4.1. does not refer to “all” and any rights, but rather only the rights listed in criterion 3.4 (see section subtitle, above) However, we will reword the question to refer to legal and customary rights.
3.4.2	Are the standards at a minimum consistent with national legislation and international agreements including CBD and ILO, in relation to these rights?	In question 3.4.2 the relevant ILO conventions should be identified as there are many of them.	Accepted - We will list relevant ILO conventions.
3.4.3	Is the implementation of these standards assessed?	a) In 3.4.3 it is unclear which standards are referred to. CBD and ILO? b) Conventions are not standards.	a) Accepted, with modification - We will rephrase the question to read “ <u>Is implementation of the standard listed in 3.4.1, and 3.4.2 above assessed?</u> ” b) Question 3.4.2 does not imply that conventions are standards. It merely asks whether the certification standards are consistent with national legislation and international agreements.
3.5	The international standard is widely recognized and provides equitable principles and criteria	a) The whole question is confusing, as there are no international forest management standards. The question implies that there is/will be a need	a) Accepted – Reword criterion to say ‘ <u>The international principles and criteria on which national standards</u>

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		<p>for international standards and there should be some additional requirements for them. The whole idea is questionable. The term “equitable principles and criteria” is also unclear.</p> <p>b) The questions are irrelevant for accreditation and certification as both activities shall not be involved in the designing, implementation and maintenance of certification schemes / systems (see comments to 2.7).</p>	<p><u>are based are equitable and widely recognized</u>’.</p> <p>b) Accepted, with modification. We agree that this series of questions do not apply to accreditation and certification but rather only to standards. However, nothing in the original constructed of the question implied that either accreditation or certification activities should be involved in the design, implementation or maintenance of the schemes/systems.</p>
3.5.1	Do parties, including NGOs, recognize the international standard as an international and equitable system?	In question 3.5.1 a reference is made to “parties” as a new concept (earlier the term stakeholders or major groups was used). Only NGOs are singled out as recognizers of an international standard. Is the Alliance considering other stakeholders of less importance than NGOs in spite of calling for equal weights between them?	Not Accepted - Original language is inclusive of, not exclusive, of any particular party. However, we will replace “parties” with “stakeholders” as suggested, to ensure consistent use of terminology throughout the QACC. The Alliance clearly does not see any stakeholder of less important than any other (see response to 3.1.3 above).
3.6	Active commitment of the managers/owners of the certified unit to the certification process and requirements	<p>a) “Activeness” of commitment is an unclear formulation. Commitment should be sufficient here.</p> <p>b) The sub-questions ignore the fact that what counts is the outcome of forest management on the ground rather than what bureaucratic procedures should be required from smallholders or community forests.</p> <p>c) Contractual arrangements with individual forest owners (with only few hectares of forest land), as an obligation would rule out a large part of the world’s well-managed and certified</p>	<p>a) Accepted - “Active” will be deleted from the wording of criterion 3.6.</p> <p>b) Accepted, with modification - Intent of wording is to encompass those situations where the managers/owners of the unit in question outsource or delegate the actual management to other parties. Question will be reworded to read <u>“Commitment of the owners or managers of the certified unit, or their designated intermediaries, to the</u></p>

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			<p>forests from the global area of certified forests. Such an outcome cannot be the purpose of this kind of assessment.</p> <p>In developing countries these provisions will lead to a situation where administrative requirements put power into the hands of "professional managers" while the forest owners frequently do not have a clear idea what is being signed, and why, where certification is concerned. This has become clear in earlier research in some developing and developed countries. One should also have a possibility to rely on extension organizations and forest owners' organizations as intermediate bodies for certification of smallholders.</p>	<p><u>certification process and requirements."</u></p> <p>c) It is accepted practice that the entity which is certified be in a position to ensure that the requirements of that certification be fulfilled. The same is true for the relationship between the certifying body and the certified entity. ISO guides 62(3.7.3) and 65(14.3) require that certification bodies take measures, including legal actions, to ensure compliance with the certification requirements. This does not, however, exclude individual land owners or community organizations with small holdings that choose to pursue certification through an intermediate body where there is evidence of free and informed consent and accountability mechanisms.</p>
3.7		Existence of clear reporting mechanisms to stakeholders	<p>This question raises the issue of accountability of systems and schemes to stakeholders. There is a need to include a new dimension in the questionnaire for a balanced treatment of the accountability issue. For example are stakeholders themselves participating in the process accountable and do they have procedures in place to ensure accountability.</p> <p>The QACC questionnaire is conflicting one of the basic principles of third party conformity assessment (questions 3.7.3 and 3.7.5) as the confidentiality of information obtained during the audits is required by ISO Guides 62, 65, 66. In order to gain the privileged access to</p>	<p>This criterion, as well as the QACC overall, was designed taking into account the relevant ISO guides.</p> <p>The ISO guides says that certification bodies must respect confidential information, but do not say that all information is confidential. Therefore, provided that it is clear from the outset of the certification process that information will be put in the public domain, and there is a mechanism for ensuring that genuinely confidential information is respected, the requirements are quite consistent with</p>

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		<p>information that is needed for the certification body to adequately assess conformity to requirements for certification, a certification body needs to keep any proprietary information about an organization confidential.</p> <p>The principles of openness, i.e. public access or disclosure of information about the certification process is limited to certification procedures and certification status (i.e. the granting or withdrawing of certification). However, a certification body needs to provide appropriate access or disclosure to specific interested parties of non-confidential and non-proprietary information about the results of specific audits (e.g. audits in response to complaints).</p> <p>Annex III includes a note that certification scheme/system needs to follow ISO 14020. However, ISO 14020 requires that "Information concerning the procedure, methodology, and any criteria used to support environmental labels and declarations shall be available and appropriate and provided upon request to all interested parties". It is self-evident that the audit report and its disclosure by certification bodies (e.g. audit reports) is outside the scope of and not required by ISO 14020.</p>	<p>ISO or any other guidance on confidentiality.</p> <p>Experience from a number of existing forest certification schemes has demonstrated that this can work in practice and that public reports can provide adequate information without any breach of confidentiality.</p> <p>This criterion is also consistent with the World Bank's policy, legal requirements, and best practices regarding public disclosure as well as best practices from the growing body of Corporate Social Responsibility. In some cases, these may exceed the minimum ISO requirements.</p>

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3.7.3	Are public reports required to provide the rationale for the accreditation/certification decision?	The QACC questionnaire should follow internationally accepted approach to the third party conformity assessment. Stakeholders are involved in the standard setting process (ISO Guide 59), participate in the development of certification/accreditation procedures (ISO Guide 61, 62, 65, 66) and can submit comments to certification and accreditation bodies. Certification process itself is dealt between the certification body and its client and is not run as multi-stakeholder process. To allow stakeholders to send comments to certification or accreditation bodies, the certification standards and certification/ accreditation procedures shall be made publicly available.	Accepted - The QACC was designed to follow internationally accepted approaches as well as World Bank best practices on disclosure. See response to 3.7 above.
3.7.4	Are these sufficient for stakeholders to have an understanding of this rationale?		
3.7.5	Are the documents readily available?	Question 3.7.5 does not recognize the confidentiality of business information by implying that all the documents should be made available on accreditation assessment and certification process.	Accepted - Clarify by rewording as <u>'Are the reports referred to in 3.7.3 readily available?'</u>
3.7.6	Are the mechanisms operational?	Question 3.7.6 is unclear about what mechanisms are referred to.	Accepted - This question to be reworded for clarify as <u>"Are the mechanisms listed in 3.7.1 to 3.7.5 above operational?"</u>

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3.9	Existence of clear and workable appeal mechanisms	<p>The language of ISO Guides would be appropriate here.</p> <p>If the ISO Guides are followed, as implied in the questionnaire, it should be considered sufficient for the quality assessment.</p>	<p>Not Accepted - While based heavily upon ISO guides, the QACC also draws upon established legal requirements of The World Bank (see response to 3.7 above). The existence of clear and operational appeal mechanisms is fundamental to stakeholder credibility. This is why all World Bank operations can be appealed to an independent inspection panel if any stakeholder from any country considers that the operation has been implemented in contradiction to the Bank's operational policies.</p>
	3.9.4 Does the system/scheme have appropriate procedures to evaluate the validity of claims?	<p>Question 3.9.4 is confusing. Is QACC referring to the validity of the claims of certified entities, the certification bodies, the accreditation bodies or the scheme owners? Scheme is developing the claims and criteria for usage of these claims. They should have a mechanism to control usage of these claims by certified entities.</p>	<p>Accepted – The question will be reworded to clarify compliance with TBT and ISO guidance on need to have controls on claims.</p>
3.10	3.10.1 Does the certification scheme/system have a system for certifying the CoC that gives confidence about its ability to track certified products from their origin to point of sale?	<p>3.10.1 is worded in an unclear way. What should count here is that there is a reliable system of certifying the chain of custody. The QACC questionnaire does not include any minimum criteria for chain of custody standards. Therefore, the QACC requirement "...gives confidence about its ability to track..." will be assessed only based on subjective perception rather than based on technical criteria.</p>	<p>Accepted - Attributes that give confidence in COC systems to be specified with input from the review panel and the results of the testing exercise.</p>

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3.10.2	Are CoC and forest management certification independent of each other?	3.10.2 is again unclear and easily causes confusion: what does independence mean in this context. What is important is that forest management and Chain of Custody certifications are separate operations. In integrated operations companies should be allowed to use the same certifier for both purposes.	Accepted - The question will be reworded as " <u>Are the forest management and Chain of Custody operations certified separately?</u> "
3.10.3	Are the claims made in relation with certification precise and understandable (e.g. when providing the proportion of certified material in a given product)?	3.10.3 again uses unclear wording. Understanding of claims is not the issue as this is very subjective. The claims should be rather assessed as to whether they are truthful or not. It would be better to use TBT/ISO language here or ISO 14020.	Accepted – The question will be reworded to replace "precise and understandable" with " <u>accurate, verifiable, relevant and non-misleading</u> " per ISO 14020.

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3.10.4	Does the certification scheme/system claim that certification under their system ensures to the public that sustainability is achieved, either in the scheme/system documentation or on product declarations? [answer should be no]	<p>Question 3.10.4 Sustainable forest management can be defined in a respective certification standard through the appropriate procedures (which are covered elsewhere in the QACC). Indeed, certification standards, together with the Criteria and Indicators for SFM, are presently the main tools for how SFM can be defined in practice. If the Alliance is promoting sustainable use – as stated in its title and objectives – it is illogical that such use cannot be referred to as it is one of the main tools being promoted by the Alliance. The term “sustainable forest management” supported by several intergovernmental processes is clearer and less misleading than terms such as “well managed forest”, “improved forest management”, “responsible forest management”, etc. whose use is not being questioned by the QACC questionnaire.</p> <p>Annex III (Guide to Using the Questionnaire) includes reference to ISO 14020, Principle 1 (claims shall be accurate, verifiable, relevant and non-misleading). The referred ISO publication does not include any restriction concerning the usage of the term “sustainable forest management” or “sustainability”.</p>	<p>Not Accepted - ISO Guide 14021 (5.5) clearly states that “...there are no definitive methods for measuring sustainability or conforming its accomplishment. Therefore, no claim of sustainability shall be made.” The source for this quote is cited in Annex III (Guide to Using the Questionnaire), page xxvi, footnote 18. However, we will consider including the relevant quote into the footnote.</p> <p>The Alliance fully supports international efforts to move toward sustainable forest management. Alliance annual reports have always described its improved forest management target as helping to bring “200 million ha of production forests under independently certified sustainable management. “ Use of the term “improved forest management” is defined by the Alliance’s revised guidance note for improved forest management & certification target included as Annex I of the QACC.</p>

QACC No.	QACC Criterion/Questions	PEFCC Comment	Alliance Response
3.10.5	Is the certification scheme/system performance or system based (refer to comment on criterion 4)	The usefulness of 3.10.5 is doubtful as all known standards include elements of both performance and management system requirements. If the purpose is to single out ISO 14000 based systems, the question should be reformulated accordingly.	<p>Not Accepted - This question is important whenever claims are made in association with a certification. ISO 14020 Principle 1 requires that such claims be accurate, verifiable, relevant and not misleading. ISO/IEC guides 61 and 62 furthermore clarify that such claims should not infer that a performance has been reached when certification is granted on the basis of a quality or environmental management system.</p> <p>We agree, however, that this could be made more explicit, and better stated as <u>'Are all claims about forest management underpinned by appropriate performance requirements in the standard.'</u></p>
3.10.6	If system based, do the claims of the certification system/scheme's infer environmental performance? [answer should be no]	Question 3.10.6 is again necessary, as the truthfulness of the claims has been covered elsewhere in the QACC.	Accepted - See response to 3.10.5 above.
3.11	Existence of procedures to handle noncompliance or misuse of reference to accredited/certified status, trademark or logo, including enforcement mechanisms	These issues should be better handled through the provisions of respective ISO standards.	Not Accepted - This is a widely accepted requirement and as the ISO requirements appear in a wide number of guides, it seems reasonable to summarize them here in this section.

QACC No.	QACC Criterion/Questions	PEFCC Comment	Alliance Response
4.1	Existence of system and performance elements in the standards at national and/or sub-national levels	These questions are repetitive as they are already covered elsewhere in the document and in addition question 4.1.2 is ambiguous. There is also unnecessary overlap with question 3.10 which in itself is not logical as stated above.	<p>Accepted - The need for apparent repetitiveness and overlap will be evaluated as a part of the field test and review process.</p> <p>A number of questions cover identical or similar issues to those addressed in previous tests. They have been included in each test because they are important component of the corresponding criterion. It is also a common procedure in questionnaire design to repeat questions in order to check consistency.</p>
	4.1.2 Does the balance between system and performance provide a clear view both of the current state of a forest and its probable state in the future under the current management?		Not Accepted - The intent of 4.1.2 is very clear: does the assessment of forest management by the scheme/system in question provide a clear view of both the current and likely future status of the future?

QACC No.	QACC Criterion/Questions	PEFCC Comment	Alliance Response
4.1.3	Does the standard claim (e.g. in its title or introduction) that it is a sustainable forest management standard? [answer should be no]	<p>a) 4.1.3 The QACC questionnaire should give a rationale why the usage of the term “sustainable forest management” is discriminated against amongst other terms.</p> <p>b) See also comments to 3.10.4.</p> <p>c) If the “WB / WWF Alliance for forest conservation and sustainable use” continues to discourage to use the term “sustainable” then it too should consider avoiding the usage of this term in its name, and all World Bank and WWF documents</p>	<p>a) Not Accepted. ISO Guide 14021 (5.5) clearly states that “...there are no definitive methods for measuring sustainability or conforming its accomplishment. Therefore, no claim of sustainability shall be made.”</p> <p>b) Not Accepted. See response to comment 3.10.4</p> <p>c) Not Accepted. The use of the term “sustainability” in the name of the WB/WWF Alliance and related publications is not a claim of having achieved a threshold, but rather a statement of the goal behind our work. This is fully consistent with ISO guidance.</p>
4.2	4.4.1 Are there explicit performance requirements in the standard, including CoC if relevant?	4.4.1 is already adequately covered elsewhere in the QACC.	Accepted- The adequacy of coverage elsewhere and the need for consistency checks will be evaluated as a part of the field test and review process.
	4.4.2 Does the standard represent the best available technical knowledge and scientific understanding?	<p>4.4.2 is practically impossible to assess in an objective way. Furthermore, as the forest management includes a value judgment, it is clear that the outcome cannot always represent best available technology - and it should not do so either if it is in conflict with the views expressed during the standard development process.</p> <p>(It is also noted that numbering of sub-questions under this question is wrong).</p>	<p>Accepted - The practicality of assessing this question on an objective basis will be evaluated as part of the field test and review process.</p> <p>(Accepted. The numbering of sub-questions will be corrected to correspond with the numbering of the criterion)</p>

QACC No.		QACC Criterion/Questions	PEFCC Comment	Alliance Response
4.3		Implementation of a holistic approach to maintain all forest values, products and services, i.e. addressing social, environmental and economic aspects, the spatial scale (local to global) as well as the many services of the forests	This is already covered in question 1. Additional wording here does not add anything of significance.	The need for apparent repetitiveness and need for additional wording will be evaluated as a part of the field test and review process. It has been included here because it is an important component of technical rigor (test 4), just as it is for stakeholder credibility (test 3), and with the compatibility with Alliance objectives (test 1). It is also a common procedure in questionnaire design to repeat questions in order to check consistency.
4.4		Recognition of indigenous people, local communities and worker's rights	The issue is covered under 1.1.4. This is unnecessary duplication. See also comments there.	The need for apparent repetitiveness and duplication will be evaluated as a part of the field test and review process. See response to comments 4.3 and 1.1.4 above.
4.5	4.5.1	Does the system require systematically an independent accreditation for certification bodies?	In 4.5.1 one should be aware of the fact that most national accreditation bodies are governmental.	Accepted - However there are some that are not. The key point here is whether the accreditation body is independent of the certification body being accredited. If the accreditation body is governmental or non-governmental is not relevant to this question.

QACC No.	QACC Criterion/Questions	PEFCC Comment	Alliance Response
4.5.3	<p>Is the accreditation body affiliated to an international accreditation organization (alliance/forum) such as the International Accreditation Forum (IAF) or the Social and Environmental Accreditation and Labeling (ISEAL) ?</p>	<p>As regards 4.5.3 the international status of ISEAL should first be clarified.</p> <p>The QACC questionnaire gives the IAF and ISEAL equal status. However there are significant differences between these two organizations in the scope and outputs of their work. IAF is an internationally recognized organization which, through its requirements and procedures (assessment and monitoring of accreditation bodies' work), guarantees that member accreditation bodies follow and comply with requirements adopted or set up by IAF (ISO Guide 61, 62, 65, 66, etc.).</p> <p>On the other hand, from publicly available information on ISEAL (www.isealalliance.org), there is not evidence that ISEAL would require compliance with ISO Guide 61 (as required in Annex III of the QACC questionnaire) and that the scope of ISEAL work would provide the same guarantees as IAF meeting the QACC objectives.</p>	<p>The IAF and ISEAL are given only as examples, not exclusive specifications. A certification scheme/system should function under an accreditation system that ensures that all the required elements are in place and operational. Affiliation with an international group of similar bodies is a way to ensure quality. Membership criteria in these groups should include the relevant ISO/IEC guides.</p>
4.5.4	<p>Do the accreditation body's requirements for accreditation meet ISO/IEC Guides 62 and 65?</p>	<p>Many forest certification schemes are connected with accreditation programs developed based on ISO Guide 66 (General requirements for certification/registration bodies operating environmental management system certification). There is no rational why ISO Guide 66 was excluded when ISO Guide 62 for quality management system was included there. It should be also noted that ISO is developing a common standard for certification of both environmental and quality management systems.</p>	<p>Accepted - Guide 66 will be added to the list in question 4.5.4.</p>

QACC No.	QACC Criterion/Questions	PEFCC Comment	Alliance Response
4.5.5	Do the accreditation body's requirements for accreditation go beyond ISO/IEC Guides 62 and 65 (e.g. peer review, consultation, sampling)?	The logic of 4.5.5 is difficult to understand. In addition, the additional points are covered elsewhere in QACC. What is the rationale to go beyond internationally respected ISO Guides in forest certification when these documents are sufficient in all the other sectors and businesses?	While the ISO documents referenced are good generic guides, they do not provide any specific guidance for operating in the forest sector, particularly with regard to performance standards. Therefore, more specific guidance will always be needed when these generic guides are applied to any specific sector.
4.5.6	Does the accreditation body's requirement require that certification happen in principle at the Forest Management Unit level?	<ul style="list-style-type: none"> a) Question 4.5.6 would require the definition of FMU, which has not been stated. b) The general principles of the third party conformity assessment expressed in the relevant ISO Guides require that the audit takes place at the level where it is possible to assess conformity with the relevant standard. Therefore the certification/audit happens at the level defined by certification standard/scheme, in which certification bodies shall not be involved (see comment to Question 2.7). The accreditation body assesses only whether or not the certification body is competent and independent to carry out the certification. 	<ul style="list-style-type: none"> a) The FMU (forest management unit) term has a long history of use within the international forest literature dating back to the ITTO Criteria and Indicators published in 1991 b) Although forest certification has been considered at many scales, only the forest management unit (FMU) scale has proven to be viable to date. Using the FMU as the unit of assessment also has the benefit of recognizing individual achievements without waiting for an entire national, subnational or larger configuration of subunits to fulfill the certification criteria. Many of the WB/WWF Alliance constituents and stakeholders have a preference for certification at the FMU level.

QACC No.	QACC Criterion/Questions	PEFCC Comment	Alliance Response
4.5.7	Do the accreditation requirements require that a meaningful proportion of the audits occur in the field?	<p>a) Question 4.5.7 should be reformulated. What is needed is the reliability of assessment result, not “meaningful proportions of audits”.</p> <p>b) The explanatory comments suggest that a certification system should function under an accreditation system. This is not incorrect as accreditation bodies can’t be involved in designing or implementing certification schemes / systems.</p>	<p>a) Accepted - A certification scheme/system should operate under an accreditation system that ensures that all the required elements are in place and operational, and based upon actual audits on the ground. We will reword the question to read: <u>“Do the accreditation procedures require sufficient field audits to ensure reliable results?”</u></p> <p>b) Accepted - We agree that this is not incorrect.</p>
4.7	Existence of a system to carry out periodic independent surveillance after initial certification or accreditation	ISO Guides 61, 62, 65, 66 require periodic surveillance. The compliance with them is required elsewhere in the QACC questionnaire.	Per previous responses to criteria 4.3 and 4.4., the need for apparent repetitiveness and duplication will be evaluated as a part of the field test and review process. Several QACC requirements are also in ISO Guides. However many people are not familiar with the ISO guides. Therefore, it is useful to cite the key requirements.
4.8	4.8.2 Do certification bodies provide consultation services to organizations seeking their certification? [answer should be no]	This is covered by ISO Guides 62, 65, 66	See comment on 4.7 above.
	4.8.3 Do the accreditation bodies provide certification services? [answer should be no]	4.8.3 and 4.8.4 are already covered by question 4.8.1.	The utility of repetitiveness and duplication will be evaluated as a part of the field test and review process

QACC No.	QACC Criterion/Questions	PEFCC Comment	Alliance Response
4.8.4	Are certification bodies allowed to enter into contractual agreements with accreditation bodies (other than accreditation agreements), that might create conflicts of interest? [answer should be no]		
4.8.5	Can the certification bodies choose the sampling sites and intensity (above the accreditation requirements)?	Questions 4.8.5 and 4.8.6 are unnecessary as they are already covered. The certification and accreditation bodies operate according to international standards and scheme specifications. Therefore these questions are relevant to standardization rather than to certification or accreditation. Comments to the issue where the certification happen are given in 4.5.6.	The necessity of these questions will be evaluated as a part of the field test and review process. However, we believe that question 4.8.5 is fundamental to the technical rigor of the certification process. We accept that it does not apply to the accreditation process.
4.8.6	Do the certification bodies write the certification report independently, including its public summary?	The Annex III (page xxvi) makes a reference to ISO Guide 61, chapter 2.1.2 o. However, it does not include a requirement that the accreditation body or its related body shall not be involved in the designing, implementation and maintenance of certification schemes / systems.	This is implicit in guidance note 4.5 (Annex III, pg xxvi). However the need for more explicit reference will be evaluated as part of the field test and review process.
4.9	Are the above accreditation and auditing systems operational?	This question is unnecessary. To make the document consistent, such a question should be added to all the current questions. The terminology should be clarified as it is not clear what is meant by “auditing system”.	Many certification schemes begin operation before they are able to fully implement all their procedures and requirements so this is a relevant question. However, this criterion will be reworded as: <u>“All aspects of an accreditation and auditing systems should be operational for the purpose of quality assurance before certificates are issued and claims made.”</u>

QACC No.		QACC Criterion/Questions	PEFCC Comment	Alliance Response
4.10	4.10.1	Are there any known cases or any evidence of forest owners or managers certified without knowing/realizing it?	<p>4.10.1 Voluntariness in the certification process is focused on the certified entity voluntarily applying for certification and being assessed. In the case of group and regional certification individual forest owners are not the applicants for certification.</p> <p>This will pose problems for smallholders and community forests that have assigned certification-related tasks to their organizations or representatives as part of the management duties. What is more important than this is that the standard requirements are complied with on the ground.</p>	<p>Accepted - See response to comments on criterion 3.6</p> <p>If a land owner is certified and does not know it, this raises the question about the likelihood that the certification requirements are being adhered to on the ground.</p> <p>The existence of a formal agreement has proven to be a means to verify how voluntary the system is, and its application to the forest in question.</p> <p>For clarity, this question will be reworded as: <u>“Are there any known cases -- or any evidence of -- forest owners or managers or their designated intermediaries being certified without their explicit knowledge and consent?”</u></p>
	4.10.3	In the case of regional certification, do individual forest owners/managers have the option not to participate in the certification scheme/system?	<p>4.10.3 is not necessary and at least its justification is unclear. 4.10.4 is relates to this.</p> <p>4.10.4 is cover by 4.10.3. To make the document consistent, the question</p> <p>4.10.4 should be applied to all the questions as all scheme requirements / procedures should be also implemented “in reality” and not “on paper” only.</p>	<p>Not accepted - The ability of individual owners or managers to opt out of a regional or group certification is a very strong indicator of how voluntary the system is.</p> <p>The need for apparent repetitiveness and duplication will be evaluated as a part of the field test and review process.</p>
	4.10.4	Is this option "on paper" or a reality?		

QACC No.	QACC Criterion/Questions	PEFCC Comment	Alliance Response
4.10.5	Do governmental interests dominate the certification scheme/system?	As regards 4.10.5, government interests do not, by definition, dominate voluntary certification systems. Governments may at some point, however, adjust regulations to encompass certification standard requirements. This should not, however, be interpreted as domination	Several countries have proposed to introduce governmental (and thereby obligatory) over voluntary certification systems. However, the necessity of this question will be evaluated as a part of the field test and review process.