

Certification robustness

Book Chain Project: Forest Sourcing workstream

Executive summary

Forest certification is widely recognised as the strongest tool available to ensure products are sourced from responsibly managed forests. At the same time, no system is waterproof, and we have been closely following recent investigative reports on the robustness of certification in certain countries.

This document critically evaluates the robustness of the two main forest certification systems – the Forest Stewardship Council (FSC) and the Programme for the Endorsement of Forest Certification (PEFC) – in ten countries. We started by building up an overview of country-specific forest risks for each country based on reputable sources such as Chatham House, Preferred by Nature (formerly NEPCo) and Earthsight. We then assessed the applicable FSC and PEFC standards against the country risk profile, highlighting key gaps. All information publicly available as of 31 March 2021 was considered.

The countries were selected based on the following criteria:

- Forest risk on the Book Chain Project (BCP) Country Forest Risk Tool (2020);
- Transparency Corruption Perceptions Index score of >5 (indicating mid-high levels of corruption);
- Top 10 countries in terms of publisher picks on the BCP system and/or volume bought based on volumes research conducted in 2019.

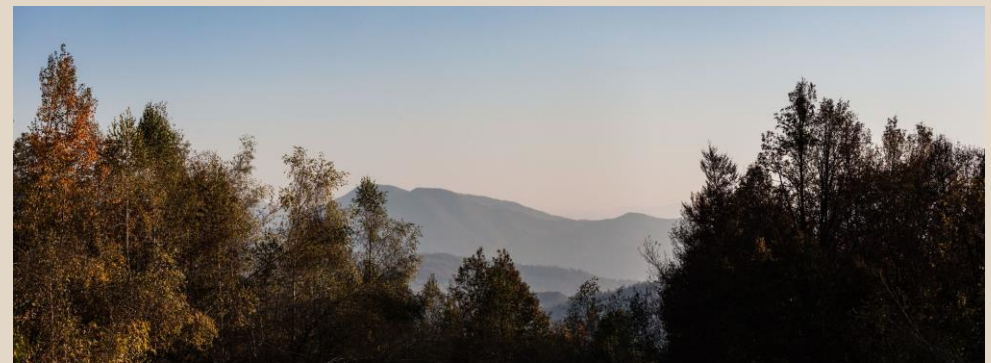
Certification schemes and environmental NGOs agree that forest certification, on its own, is not designed to solve deforestation. Additional robustness measures may be required. We recommend that Publishers use this document to understand the level of certification robustness in priority countries, as a basis for setting their sourcing policies based on their risk appetite.

Concerns from the NGO community around certification robustness

Recent [Greenpeace](#) and [Earthsight](#) reports make the following claims regarding certification robustness:

- Standards may change depending on the country and region. This adaptability can either strengthen them when locally adapted; or weaken them whenever they depart considerably from the global principles and criteria.
- No Forest and Ecosystem Risk Commodity (FERC) certification system currently contains a truly unbroken traceability system, tracking commodities from source to end product; and there is a lack of transparency around the ultimate ownership of certified companies.
- Scheduled audits only represent a snapshot of conditions, and there is a risk of a conflict of interest where certifiers are paid by the companies seeking certification.
- The interpretation, implementation and enforcement of certification standards often falls short.

To quote the Greenpeace report in summary: “[w]hile some certification schemes have strong standards, weak implementation combined with a lack of transparency and product traceability means even these schemes have major failings.”



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Image credit: Ulet Ifansasti / Greenpeace

FSC and PEFC

FSC and PEFC are the two internationally recognised systems for the certification of responsible forest management and its supply chain. They are both official [indicators](#) of progress towards Sustainable Development Goal (SDG) 15, Life on Land. According to the UN [Food & Agricultural Organization](#) (FAO), around 425 million hectares of forest worldwide are certified under either (or both) scheme(s).

FSC works top-down, through an international standard which is interpreted at national level. PEFC works bottom-up, through mutual recognition and endorsement of national standards which adhere to international criteria.

FSC

FSC was set up by a group of businesses, environmentalists and community leaders in 1994 to provide a system for voluntary accreditation and independent third-party certification of forests. As of February 2021, over 220m hectares of forest were FSC certified worldwide (source: [FSC](#)).

The [FSC Principles & Criteria for Forest Stewardship](#) (P&C) set out the 10 principles that must be adhered to in order to achieve forest management certification, with each principle containing a number of criteria to provide a practical means of judging whether these principles are being adhered to or fulfilled within a given Management Unit. They cover both wood and non-timber products, conservation, protection and ecosystem services, as well as other uses. They are applicable to all types of forest, including

natural forests, plantations, and other, non-forest vegetation types that involve the growing of trees.

The P&Cs are developed through public consultation and multi-stakeholder processes, and are interpreted at regional or national level through Regional and National Forest Stewardship Standards (RFSS / NFSS) to reflect the diverse legal, social and geographical conditions of forests in different parts of the world. The [International Generic Indicators](#) (IGI) provide a set of indicators that address each normative element of each Criterion in the P&C. They are the common starting point for the development of all Regional and National Forest Stewardship Standards in the FSC system. NFSS are developed by Standard Development Groups which have representation across the FSC's three chambers (Economic, Environmental, and Social) and may include multi-stakeholder processes and public consultations. In the absence of an NFSS, countries may develop Interim National Standards. These constitute the P&C together with the IGI that are adopted or adapted to the national conditions by a Technical Working Group (TWG).

Forests are inspected and certified by independent Certification Bodies (CBs), that are accredited by Assurance Services International (ASI), a certification 'watchdog' which was set up by FSC but now operates independently. Certification decisions are guided by the extent to which management activities satisfy each Criterion and the importance/consequence of failing to satisfy each FSC Criterion. If the forest management is in full compliance with FSC requirements, the FSC certificate is

The 10 FSC Principles & Criteria

1. Compliance with Laws
2. Workers' Rights and Employment Conditions
3. Indigenous Peoples' Rights
4. Community Relations
5. Benefits from the Forest
6. Environmental Values and Impacts
7. Management Planning
8. Monitoring and Assessment
9. High Conservation Values
10. Implementation of Management Activities

awarded. If the forest management is not fully compliant, pre-conditions are noted which must be fulfilled before the FSC certificate can be awarded. If minor non-compliances are noted, the certificate can be issued with conditions that have to be met within a clearly determined timeframe. Failures or lapses in performance that are discovered by CBs during audits may result in minor or major Corrective Action Requests depending on the severity of the nonconformity.

PEFC

PEFC was set up in 1999 by small- and family forest owners in Europe to create a forest certification system tailored to small forest owners. As of February 2021, over 330m hectares of forest worldwide were PEFC certified (source: [PEFC](#)).

The 6 PEFC Operational Criteria

1. Maintenance or appropriate enhancement of forest resources and their contribution to the global carbon cycle
2. Maintenance of forest ecosystem health and vitality
3. Maintenance and encouragement of productive functions of forests (wood and non-wood) Community Relations
4. Maintenance, conservation and appropriate enhancement of biological diversity in forest ecosystems
5. Maintenance or appropriate enhancement of protective functions in forest management (notably soil and water)
6. Maintenance or appropriate enhancement of socio-economic functions and conditions

to obtain PEFC endorsement must submit to a comprehensive and rigorous assessment process, including independent evaluation and public consultation. This 'bottom-up'

As an umbrella organisation, PEFC endorses Regional or National Forest Certification Systems (RFCS / NFCS). These have been developed through multi-stakeholder processes, public consultations, and are tailored to local priorities and conditions. They are reviewed every five years. To receive endorsement, certification systems undergo rigorous third-party assessment against PEFC's [Sustainable Forest Management Benchmark \(SFM\)](#). Any national certification system seeking

approach ensures that standards meet the expectations of stakeholders on the ground, address local conditions, and are consistent with national laws and regulations, while at the same time meeting international benchmarks and being internationally recognised.

The [SFM](#) benchmark lays out the international requirements for sustainable forest management. It contains 6 Criteria that set out key operational requirements for forest managers. The SFM benchmark was developed by a working group with representation of all relevant stakeholders. The requirements have evolved and go beyond international guidelines, such as the Ministerial Conference on the Protection of Forests in Europe (MCPFE), and the African Timber Organization (ATO) and International Tropical Timber Organization's (ITTO) processes for tropical forests among others. Forest management certification is only granted if all non-conformities have been resolved.

PEFC only works with 'PEFC-notified' Certification Bodies (CBs) which are accredited by national Assurance Bodies (ABs), which operate under the umbrella of the International Accreditation Forum (IAF). National ABs need to be a member of the IAF Multilateral Recognition Arrangement (MLA). Admittance to the MLAs is granted only after thorough evaluation of an AB's operations by a peer evaluation team that ensures the AB is compliant with both international standards and IAF requirements. This approach ensures a truly independent oversight mechanism, ensuring accountability and preventing conflicts of interest.

Steps to certification

The steps to certification are largely the same for FSC and PEFC. Many CBs offer both FSC and PEFC certification, and certification to both systems tends to provide business advantages as it increases the pool of potential suppliers of certified products.

FSC & PEFC Steps to certification

1. Contact accredited CB
2. Submit certification application to CB
3. Undergo on-site audit by accredited CB
4. Certificate valid for 5 years; annual surveillance audit required.



Certification Robustness: Summary

The table overleaf summarises the main forest risks, relevant provisions in the applying FSC and PEFC standards, and an indication of whether the risks are covered, for each of the 10 analysed countries.

Country	Main Risks	FSC provisions	Robustness of provisions	PEFC provisions	Robustness of provisions
Brazil FSC standard PEFC standards: Native forests Plantations	Bribery	No reference to bribery	⊗	No reference to bribery	⊗
	Corruption	No reference to corruption	⊗	No reference to corruption	⊗
	Illegal logging	Criteria 1.1 and 1.5	✓	Native forests: Criterion 2.1 covers protection against illegal logging Plantations: no reference to illegal logging	✓ ⊗
	Weak enforcement of regulation	Criterion 1.1; indicators 1.1.1-1.1.3	✓	Native forests: Criterion 1.1, a) and b) Plantations: Criterion 1.1, a) and b)	✓
Czech Republic FSC standard PEFC standard	Weak enforcement of regulation	Criterion 1.1; Indicators 1.1-1.3	✓	No reference to compliance or demonstration of enforcement of regulations in NCFS	⊗
		COC Requirement 6 covers compliance with timber legality legislation	✓	COC standard requires due diligence system for avoidance of controversial sources, which covers compliance with all applicable timber legality legislation	✓
Hungary IGI PEFC standard	Failure to designate areas towards protection	Principle 1, Annex A Criteria 6.4 and 9.3	✓	Requirements 2 and 8 references “registration” and “possess records on” protected areas but no further requirements	?
	Weak enforcement of regulation	Criteria 1.4 and 1.5	✓	Requirements 0.5 and 0.6	✓

Country	Main Risks	FSC provisions	Robustness of provisions	PEFC provisions	Robustness of provisions
Indonesia FSC standard PEFC standard	Bribery	Criterion 1.7	✓	No reference to bribery	⊗
	Corruption	Criterion 1.7	✓	No reference to corruption	⊗
	Loopholes in logging permit regulation	Criterion 6.10 covers and prohibits forest conversions to plantations or non-forest land uses	?	Section II and III prohibits the conversion of forests to other land uses, except in justifiable circumstances	?
	Weak enforcement of regulation	Criterion 1.3	✓	Section I, Criterion 1.2 and 1.5	?
Latvia IGI PEFC Standard	Health & Safety compliance	Criterion 2.3	✓	Criteria 6.1.6 and 6.2.3 (3)	✓
Lithuania FSC Standard	Weak implementation of protections of areas and species	Criterion 6.4; indicator 6.4.3	✓	No PEFC NFCS currently exists for Lithuania	NA
	Health & Safety compliance	Criterion 2.3; indicators 2.3.1-2.3.5	✓		NA
Poland FSC Standard PEFC Standard	Disregard for the Rule of Law in isolated incidences	Criteria 1.1 and 1.3	✓	Criteria 4.7.1 and 4.7.2	✓

Country	Main Risks	FSC provisions	Robustness of provisions	PEFC provisions	Robustness of provisions
Russia FSC Standard PEFC Standard	Bribery	Criterion 1.7	✓	No reference to bribery	⊗
	Corruption	Criterion 1.7	✓	No reference to corruption	⊗
	Illegal salvage logging	Criterion 1.4 covers illegal resource use, though does not specifically reference <i>salvage</i> logging.	?	Criterion 1.1 covers compliance with forest legislation. Criterion 1.5 covers illegal forest clearing, though does not specifically reference <i>salvage</i> logging.	?
	Lack of information due to state secrecy	NA	NA	NA	NA
	Weak enforcement of regulation	Criteria 1.5	✓	Criterion 1.1; indicators 1.1.5-1.1.10	✓
Slovakia IGI PEFC Standard	Illegal salvage logging	Indicator 1.4 covers illegal resource use, though does not specifically reference <i>salvage</i> logging.	?	Criterion 4.5 covers leaving standing wood.	✓
	Weak implementation of protections of areas and species	Criteria 6.4 and 9.3	✓	Criteria 4.6 and 4.7; 7.1 and 7.2	✓
Ukraine FSC Standard	Bribery	Criterion 1.7; indicator 1.7.5-1.7.6.	✓	No PEFC NFCS currently exists for Ukraine, but one is currently being developed (joined Nov 2019).	NA
	Corruption	Criterion 1.7; indicator 1.7.2.-1.7.6	✓		NA

Country	Main Risks	FSC provisions	Robustness of provisions	PEFC provisions	Robustness of provisions
	Illegal logging	Criterion 1.4			NA
	Weak enforcement of regulation	Criterion 1.3; indicator 1.3.1			NA



= fully/robustly covers



= partially covers (e.g. referenced but unclear how risk is fully managed/mitigated)



= not covered

Certification Robustness: By Country

Brazil

Summary of main risks

- Bribery
- Corruption
- Illegal logging
- Weak enforcement of regulation



Chatham House's [Forest Governance tool](#) ranks Brazil's forest management as 'Fair'. Indicators that score particularly low include Legislation & Regulations on illegally sourced timber, and Policies & measures concerning demand for legal timber. They state that 'Between 2013 and 2018, Brazil has seen a number of subtle but important improvements in its fight against illegal logging. Although the exact figures are still unknown of how much timber produced in the Amazon is illegal, there were significant advances on the fronts of transparency and in the regulations and norms related to logging.' In 2020, deforestation saw a sharp increase under Brazilian President Jair Bolsonaro.

The [European Commission](#) has stated that 'There have been failures in payment of fines for environmental crime, with only 5% of fines imposed by the relevant authorities paid; failures to act on evidence from satellite analyses of forest degradation; problems implementing a management system for administrative information in relation to the timber trade; and a lack of clarity on appropriate tax arrangements. It has also been alleged that some timber plantations have been sited on illegally obtained land'. It also reports that the lack of field inspections was considered a key weakness in the state-

Overview of the forest sector

- CPI score: 38/100 (2020)
- Total forest cover: 493.5m ha (59%) (source: [Chatham House](#)). Of the approx. 463.5m ha, 456.1m are native or natural forests (with 325.5m hectares of these in the Amazon Biome). The remaining 7.2m hectares are planted forests.
- Forest Ownership: 46.9% state owned; 28% owned by local communities (source: [UNEP & WCMC](#))
- FSC certified: 7.9m ha (2021; source: [FSC](#))
- PEFC certified: 4.2m ha (2020; source: [PEFC](#))

level licensing process for Sustainable Forest Management Plans, facilitating illegal logging by allowing forest engineers to overestimate volumes or fraudulently add trees of high commercial value

[Mongabay](#) report that a lack of adequate resources for oversight and enforcement of environmental regulations is common in Brazil. Ibama, Brazil's federal environment agency, has had its budget repeatedly cut in recent years and it now has less than half of the 1,600 field agents it had in 2009.

In 2019, [Earthsight](#) reported on a corruption scheme involving Ibama employees, military police officers, and large-scale cattle ranchers operating illegally. According to the police, Ibama staff received bribes to overlook land grabbing and illegal deforestation of public lands. As part of the scheme, Ibama agents allegedly informed the ranchers of dates and places of upcoming enforcement operations and deliberately failed to seize equipment used to clear forests. The same operation also uncovered evidence that military police officers had been hired by the ranchers to protect ranch areas and equipment and threaten and eject local residents from the area. The Federal Police found evidence of at least one attempted murder against a small farmer who had opposed land grabbing and deforestation in the area.

FSC relevant criteria & indicators

- [Harmonised Certification Bodies' Forest Stewardship Plantation Standard for the Federal Republic of Brazil](#)
- [FSC Forest Stewardship Standard for Brazilian Small and Low Intensity Managed Forests \(SLIMF\)](#)
- [FSC Standard for Forest Management on "Terra Firme" in the Brazilian Amazon](#)

Risk(s): Illegal logging and Weak enforcement of regulation

Principle 1 - Compliance with laws and FSC principles

Criterion 1.1 Forest management shall respect all national and local laws and administrative requirements.

1.1.1. The Organisation shall demonstrate knowledge of legislation applicable to the activity developed within the forest management unit.

1.1.2. The Organisation shall demonstrate compliance with applicable federal, regional, state and local laws and regulations.

1.1.3. The Organisation shall ensure compliance with the applicable legislation by service providers, contractors, customers, buyers of wood and their contractors or subcontractors with activities in the forest management unit.

1.1.4. In case of pending administrative or legal issues, the Organisation shall act to resolve such issues, monitoring the disputes, the actions taken and to be taken, and their execution terms.

1.1.5. In the case of steps which depend on the performance of public agencies, the Organisation shall monitor progress.

1.1.6. Measures shall be implemented to prevent recurrence of the event that caused the legal or administrative issue.

Risk(s): Illegal logging

Criterion 1.5. Forest management areas should be protected from illegal harvesting, settlement and other unauthorized activities.

1.5.1. The Organisation shall have protective measures against illegal logging or illegal extraction of other products, invasions, hunting, fishing and other unauthorized activities in the FMU. Authorized activities must be controlled by the Organisation.

1.5.2. The Organisation shall establish monitoring and control systems of registration of irregular actions occurred in a Forest Management Unit and take steps to avoid or minimize such actions.

1.5.3. The Organisation shall notify the competent authorities of infractions committed in the management unit.

PEFC relevant criteria & indicators

- [PEFC Forest Management - Principles, criteria and indicators for native forests](#)
- [PEFC Forest Management – Principles, criteria and indicators for planted forests](#)

Risk(s): Illegal logging (native forests)

Principle 2 – Rational use of forest resources in the short, medium and long terms, in search of its sustainability

Criterion 2.1 The organisation shall adopt strategies orientated towards sustainable use and management of forest resources.

d) evidence of the procedures of protection against land invasion and illegal logging of forest products in the forest management area.

Risk(s): Weak enforcement of regulation (native forests and planted forests)

Principle 1 – Legal compliance

Criterion 1.1 The organization shall carry out the activities related to forest management, according to legislations and forest and current environmental regulations.

Indicators: a) existence of procedures that identify the legislation and other regulations applicable to the activities carried out in the forest management area; b) existence of records that prove fulfilment of legislation and of other regulations applicable to the activities carried out in the forest management area.

Czech Republic

Summary of main risks

- Weak enforcement of regulation



[Mongabay](#) and [other publications](#) have reported that the Czech Republic provides an entry point to smuggle illegally logged timber into the EU. Mongabay states that enforcement of regulations – particularly the EUTR - in the Czech Republic is weak, allowing timber to be smuggled into the rest of Europe from locations such as Myanmar.

Overview of the forest sector

- CPI score: 54/100 (2020)
- Total forest cover: 2.66m ha (34%) (source: [Index Mundi](#))
- Forest ownership: 59.8% state owned; 19.3% privately-owned; 16.8% communally owned/municipal forest; 2.9% legal persons; 1.2% cooperatives (source: [European Forest Institute](#))
- FSC certified: 124,349ha (2021; source: [FSC](#))
- PEFC certified: 1.8m ha (2020; source: [PEFC](#))

FSC relevant criteria & indicators

- [FSC Forest Stewardship Standard for the Czech Republic](#)

Risk(s): Weak enforcement of regulation

Principle 1 - Compliance with laws and FSC principles

Criterion 1.1 Forest management shall respect all national and local laws and administrative requirements.

1.1.1. The owner shall have at his disposal all applicable laws and ordinances related to forest management and are familiar with them

1.1.2. There is no evidence of violation of applicable laws or non-fulfilment of the duties related to forest management

1.1.3. If any non-compliances with legal or regulatory requirements have been identified by the enterprise or by third parties in the previous five years, they shall have been documented by the enterprise, were promptly corrected, and effective action has been taken to prevent their recurrence.

6 - Compliance with timber legality legislation

6.1 The organization shall ensure that its FSC-certified and controlled wood products or timber products conform to all applicable timber legality legislation. At a minimum, the organization shall: a) have procedures in place to ensure the import and/or export and commercialization of FSC-certified and controlled wood products by the organization conform to all applicable trade and customs laws² (if the organization exports and/or imports FSC products);

b) upon request, collect and provide information on species (common and scientific name) and country of harvest (or more specific location details if required by legislation) to direct customers and/or any FSC-certified organizations further down the supply chain that need this information to comply with timber legality legislation. The form and frequency of providing this information may be agreed upon between the organization and the requester, as long as the information is accurate and can be correctly associated with each material supplied as FSC certified or FSC Controlled Wood.

c) provide proof of compliance with relevant trade and customs laws;

d) ensure that FSC-certified products containing pre-consumer reclaimed wood (except reclaimed paper) being sold to companies located in countries where timber legality legislation applies either:

- i) only include pre-consumer reclaimed wood materials that conform to FSC Controlled Wood requirements in accordance with FSC-STD-40-005; or*
- ii) inform their customers about the presence of pre-consumer reclaimed wood in the product and support their due diligence system as required by applicable timber legality legislation.”*

PEFC relevant criteria & indicators

- [PEFC Criteria and indicators of sustainable forest management](#)

Appendix 1: PEFC Due Diligence System (DDS) for the avoidance of material from controversial sources

1.1 In order to help ensure that activities conducted by the organisation under the scope of this standard conform to all applicable timber legality legislation, including trade and customs laws, and to minimise the risk that the procured material originates in controversial sources, the organisation shall operate a Due Diligence System (DDS), in accordance with the following elements of this standard

3.1 The organisation shall carry out a risk assessment, assessing the risk of procuring raw material from controversial sources for all input forest and tree based material covered by the organisation’s PEFC chain of custody, with the exception of material/products delivered with a PEFC claim by a supplier with a PEFC recognised certificate, as this material can be considered as having “negligible risk” of originating in controversial sources.

Table 2: List of indicators for significant risk at origin level

a) Activities not complying with applicable local, national or international legislation on forest management, including but not limited to forest management practices; nature and environmental protection; protected and endangered species; property, tenure and land-use rights for indigenous peoples, local communities or other affected stakeholders; health, labour and safety issues; anticorruption and the payment of applicable royalties and taxes.

Table 3: List of indicators for significant risk at supply chain level

c) Evidence of illegal practices concerning controversial sources by any company in the supply chain.

Hungary

Summary of main risks

- Failure to designate areas towards protection
- Weak enforcement of regulation



[WWF](#) note that old-growth forests in Hungary are in danger. It is estimated that one-third of these forests are not protected, and more than half of the old-growth forests located on protected and specially protected public lands are being exploited.

[WWF Hungary](#) record that illegal clear-cutting took place in a protected Natura 2000 state forest area near Tiszaug in August 2020. This was the second such incident – the first took place in January 2020, for which there was no serious prosecution.

Overview of the forest sector

- CPI score: 44/100 (2020)
- Total forest cover: 1.9m ha (23% forest cover) (Source: [Index Mundi](#))
- Forest ownership: 56% state owned; 1% local community owned; 43% privately owned (source: [FSC](#))
- FSC certified: 353,420ha (2021; source; [FSC](#))
- PEFC certified: No PEFC figures given

FSC relevant criteria & indicators

- [International Generic Indicators Standard](#)

Risk(s): Failure to designate areas towards protection

Principle 1 - Compliance with laws

Annex A: Minimum list of applicable laws, regulations and nationally ratified international treaties, conventions and agreements

Principle 6 – Environmental values and impacts

Criterion 6.4 The Organization shall protect rare species and threatened species and their habitats in the Management Unit through conservation zones, protection areas, connectivity and/or (where necessary) other direct measures for their survival and viability. These measures shall be proportionate to the scale, intensity and risk of management activities and to the conservation status and ecological requirements of the rare and threatened species. The Organization shall take into account the geographic range and ecological requirements of rare and threatened species beyond the boundary of the Management Unit, when determining the measures to be taken inside the Management Unit.

6.4.3. The rare and threatened species and their habitats are protected, including through the provision of conservation zones, protection areas, connectivity, and other direct means for their survival and viability, such as species' recovery programs.

Principle 9 – High conservation values

Criterion 9.3. The Organization shall implement strategies and actions that maintain and/or enhance the identified High Conservation Values. These strategies and actions shall implement the precautionary approach and be proportionate to the scale, intensity and risk of management activities.

Risk(s): Weak enforcement of regulation

Criterion 1.4 The Organization shall develop and implement measures, and/or shall engage with regulatory agencies, to systematically protect the Management Unit from unauthorized or illegal resource use, settlement and other illegal activities.

Criterion 1.5 The Organization shall comply with the applicable national laws, local laws, ratified international conventions and obligatory codes of practice, relating to the transportation and trade of forest products within and from the Management Unit, and/or up to the point of first sale.

PEFC relevant criteria & indicators

- [PEFC Sustainable Forest Management Requirements](#)

Risk(s): Failure to designate areas towards protection

Requirement 2 – Forest management planning

2.2. In the preparation to forest management planning degree of protection and the inclusion into the NATURA 2000 network of forests is registered.

2.3 In the preparation to forest management planning primary function of forests are registered and mapped, especially in forests with special functions.

2.8. The objectives and specific means of forest management plans serve the protection of the species and genetic diversity of ecosystems, as well as the protection of landscape

2.9 The objectives and specific means of forest management plans serve the improvement of the degree of naturalness, resilience and state of health

2.11. As part of the detailed elaboration of forest management plans primary function of forests, such as protection (especially primary soil and water protection, as well as sensitive and representative forest ecosystems and areas containing endemic species in significant concentrations) and recreational functions are considered.

2.13. As part of the detailed elaboration of forest management plans areas under nature protection, NATURA 200 sites, 'ex lege' values and other values of public interest in the precincts of forests are taken into account.

Requirement 8 – Forest protection, protective functions of forest and protected forests

8.2 The manager of forest keeps records on the primary function of forest, the degree of nature protection, the NATURA 2000 designation, and on forests of outstanding soil protection, water protection and fire hazard importance

8.3 For forest protection, the manager of forest possesses records on the populations of strictly protected organisms, and uses nature protection management plans that

specify measures to protect and – where relevant – to increase their population, if they are available.

8.4 The manager possesses records on the populations of strictly protected organisms, and uses nature protection management plans that specify measures to protect and – where relevant – to increase their population.

Risk(s): Weak enforcement of regulation

Requirement 0 – General requirements and principles of application

0.5 There is a considerable overlap between the requirements in this document and the legal regulations in force. It falls within the authority of the certification body to accept the references to legal regulations as evidences, or require further proof of compliance.

0.6 The assessment of compliance shall be based on documentation primarily, supplemented by field inspection and interview with relevant actors. Requirements, to which the compliance can be verified for the group organization as a whole, can be assessed by the information provided by the applicant or by other sources.

Indonesia

Summary of main risks

- Bribery
- Corruption
- Loopholes in logging permit regulation
- Weak enforcement of regulation



Chatham House's [Forest Governance and Legality site](#) shows that Indonesia has consistently increased its score since 2008, with Indonesia now having Overall 'Fair' forest governance compared to 'Weak' in 2008. The tool states that Indonesia's Timber Legality Verification System (SVLK) has been an important initiative to address illegal logging in the country.

In 2020, the [BBC reported](#) on allegations against the Korindo Group (Korindo) concerning its oil palm operations in Indonesia. It indicated that Korindo – an Indonesian-Korean plantation and energy conglomerate that is an FSC certificate holder – intentionally used fires as part of the process of clearing vast areas of forest in remote areas of the Indonesia province of Papua. It also found allegations of violating traditional and human rights for its own benefit. FSC found that Korindo Group breached its rules on clearing forests to grow oil palm but the Group was not expelled after a two-year probe. A FSC report into allegations against Korindo were never published, following legal threats from the company.

In 2019, [the Gecko Project released a report](#) alleging that all seven plantation business licences underpinning the world's biggest palm oil development – in Boven Digoel in Indonesia's Papua province – were faked, according to officials responsible for issuing them.

In 2019, [Mongabay](#) reported that loopholes in permit legislation was allowing clearance of primary forest to continue. In 2019, a temporary moratorium first issued in 2011 on granting permits to clear primary forests and peatlands for plantations or logging was made permanent by Indonesia's president. Activists allege that the deforestation rate

Overview of the forest sector

- CPI score: 37/100 (2020)
- Total forest cover: 181.2m ha (50%) (source: [Chatham House](#))
- Forest ownership: 86.9% state-owned; 13.1% titled forest (land title registered by private organisations or individuals) (source: [Timber Trade Portal](#))
- % FSC certified: 3.1m ha (2021; source: [FSC](#))
- % PEFC certified: 3.9m ha (2020; source: [PEFC](#))

has actually increased within areas that qualify for the moratorium. The policy explicitly prohibits the issuance of new plantation and logging permits for carbon-rich primary forests — but not for secondary forests, defined under Indonesian law as those that have previously been logged to any extent. As a result, some parties are accused of deliberately clearing areas of primary forest within moratorium zones for the express purpose of degrading them. Once that happens, these areas are recognized as secondary forest, and thus fall out of the scope of the moratorium.

Mongabay's investigation, [Indonesia for Sale](#), revealed that district chiefs have systematically exploited their control over land amid a near-complete lack of oversight, to make millions of dollars by selling permits to major plantation firms. Mongabay alleges that they did so both to profit themselves, and to finance election campaigns that would return them to office, thereby creating a negative cycle of corruption.

In 2020, Mongabay [reported](#) that deforestation being carried out by two pulpwood companies linked to an FSC member was being investigated too slowly by FSC. The NGO accusing FSC of slow action, Auriga Nusantara, has questioned FSC's delayed investigation, its non-standard investigation process, and its apparent failure to link the pulpwood companies to the certified paper mill earlier.

FSC relevant criteria & indicators

- [FSC National Forest Stewardship Standard of Indonesia](#)

Risk(s): Bribery and Corruption

Principle 1 – Compliance with laws

Criterion 1.7 The Organization shall publicize a commitment not to offer or receive bribes in money or any other form of corruption and shall comply with anti-corruption legislation where this exists. In the absence of anti-corruption legislation, The Organization shall implement other anti-corruption measures proportionate to the scale and intensity of management activities and the risk of corruption.

Risk(s): Loopholes in logging permit regulation

Principle 6 – Environmental values and impacts

Criterion 6.10 Management Units containing plantations that were established on areas converted from natural forest after November 1994 shall not qualify for certification, except where:

- a) Clear and sufficient evidence is provided that The Organization was not directly or indirectly responsible for the conversion, or*
- b) The conversion affected a very limited portion of the area of the Management Unit and is producing clear, substantial, additional, secure long-term conservation benefits in the Management Unit.*

Risk(s): Weak enforcement of regulation

Principle 1 – Compliance with laws

Criterion 1.3 The Organization shall have Legal rights to operate in the Management Unit, which fit the Legal status of The Organization and of the Management Unit, and shall comply with the associated Legal obligations in applicable national and local laws and regulations and administrative requirements. The Legal rights shall provide for harvest of products and/or supply of ecosystem services from within the Management Unit. The Organization shall pay the legally prescribed charges associated with such rights and obligations.

PEFC relevant criteria & indicators

- [PEFC Sustainable Forest Management Requirements](#)

Risk(s): Loopholes in logging permit regulation

Section II: Specific requirements for management of natural forest

General requirements

Criterion 1.1 MU shall not convert forests to other land use, including conversion to plantation forests, except in justifiable circumstances

Section III: Specific requirements for management of plantation forest

General requirements

Criterion 1.1 MU shall exclude from forest certification those plantation forests that have been established by conversion of primary as well as secondary forests after 31

December 2010 except those meeting justified circumstances

1.2 MU shall not convert: forest to other land uses, including forests to plantation forests; except in the justifiable circumstances including where:

- a) The conversion is in compliance with national legislation and land use planning and is permitted by the relevant authorities;*

Risk(s): Weak enforcement of regulation

Section I: Requirements for natural and plantation forests

Criterion 1.2 MU shall comply with all legislation and regulations related to the practices of forest management; nature and environmental protection; threatened and protected species; customary rights related to the land ownership and utilization; as well as other issues related to the health and safety

1.5 MU shall comply with the requirements of SVLK.

Latvia

Summary of main risks

- Health & Safety compliance



According to [Preferred by Nature](#), there is a risk that Health & Safety requirements are not complied with, for example through a lack of compulsory health examinations for workers, failure to maintain and document maintenance of equipment, lack of health and safety action plan, and lack of health and safety training.

Overview of the forest sector

- CPI score: 57/100 (2020)
- Total forest cover: 3.35m ha (52% forest cover) (source: [Preferred by Nature](#))
- Forest ownership: 49% state-owned; 35% privately-owned; 14% owned by legal persons (source: [FSC](#))
- FSC certified: 1.2m ha (2021; source: [FSC](#))
- PEFC certified: 1.7m ha (2021; source: [PEFC](#))

FSC relevant criteria & indicators

- [International Generic Indicators](#)

Risk(s): Health & Safety compliance

Principle 2 – Workers Rights and Employment Conditions

Criterion 2.3 The Organization shall implement health and safety practices to protect workers from occupational safety and health hazards. These practices shall, proportionate to scale, intensity and risk of management activities, meet or exceed the recommendations of the ILO Code of Practice on Safety and Health in Forestry Work.

PEFC relevant criteria & indicators

- [PEFC Forest Management Standard for Latvia](#)

Risk(s): & Safety compliance

Criterion 6 – Maintenance of other socio-economic functions and conditions

6.1.6 The personnel and contractors involved in forest, plantation forest and tree plantings management are well-informed and accordingly trained about forest management sustainability criteria and indicators specified in this standard. In training and awareness raising campaigns the staff is instructed on labor safety and the measures are taken to ensure safe work environment.

6.2.3 Forest social (3) Existence of the system of health protection and labor safety

Lithuania

Summary of main risks

- Weak implementation of protections of areas and species
- Health & Safety compliance



According to [Preferred by Nature](#), there is a risk that Health & Safety requirements are violated in the private sector in Latvia.

[Fern](#) alleges that in July 2017, Lithuania’s parliament approved a highly controversial forestry reform, which centralised forest governance to facilitate the sell-off of large areas of forest and aimed to attract private investors (e.g. Ikea). More than 15,000 permits to clear-cut were issued, many in parks and Natura 2000 sites. National rules were amended in August 2018 to increase felling by 6% in protected areas; Natura 2000 sites represent almost 18% of these protected areas. The European Commission sent a letter of formal notice related to the Birds and Habitats Directive on 17 May 2018 regarding Lithuania’s failure to designate sufficient nature protection areas.

Overview of the forest sector

- CPI score: 60/100 (2020)
- Total forest cover: 2.17m ha (34.8%) (source: [Preferred by Nature](#))
- Forest ownership: 49.5% state-owned; 38.9% privately-owned; 11.6% reserved for restitution (source: [FSC](#))
- FSC certified: 1.25m ha (2021; source: [FSC](#))
- PEFC certified: N/A
- In 2010, Ikea was [listed as the biggest private forest owner](#) in Lithuania, owning a total of 27,000 hectares.

FSC relevant criteria & indicators

- [FSC National Forest Stewardship Standard of Lithuania](#)

Risk(s): Weak implementation of protections of areas and species

Principle 6 – Environmental values and impacts

Criterion 6.4 The Organization shall protect rare species and threatened species and their habitats in the Management Unit through conservation zones, protection areas, connectivity and/or (where necessary) other direct measures for their survival and viability. These measures shall be proportionate to the scale, intensity and risk of management activities and to the conservation status and ecological requirements of the rare and threatened species. The Organization shall take into account the geographic range and ecological requirements of rare and threatened species beyond the boundary of the Management Unit, when determining the measures to be taken inside the Management Unit.

6.4.3 The rare and threatened species and their habitats are protected, including through the provision of conservation zones, protection areas, connectivity, and other direct means for their survival and viability, such as species' recovery programs.

Risk(s): Health & Safety compliance

Principle 2 – Workers' Rights and Employment Conditions

Criterion 2.3 The Organization shall implement health and safety practices to protect workers from occupational safety and health hazards. These practices shall, proportionate to scale, intensity and risk of management activities, meet or exceed the recommendations of the ILO Code of Practice on Safety and Health in Forestry Work.

2.3.1 Health and safety practices are developed and implemented that meet or exceed the ILO Code of Practice on Safety and Health in Forestry Work.

2.3.2 2 Workers have collective and personal protective equipment based on established hazards at workplace.

2.3.3 Use of collective and personal protective equipment is enforced.

2.3.4 Records are kept on health and safety practices including accident rates and lost time to accidents.

2.3.5 After accidents and incidents, reasons are identified and measures are implemented to avoid them in the future, including by revising the relevant health and safety practices, as needed.

PEFC relevant criteria & indicators

- No PEFC standard currently exists for Lithuania

Poland

Summary of main risks

- Disregard for the Rule of Law in isolated incidences



In 2018, ClientEarth [reported](#) that Polish ministers had used a bark beetle outbreak to justify a threefold increase in logging in the Białowieża Forest in 2016. The Białowieża Forest has been designated as UNESCO World Heritage site and Natura 2000 site and is protected by the EU Birds and Habitats Directives. ClientEarth alleges that this logging was illegal and consequently lodged a complaint to the European Commission, calling for an investigation. In 2017, the European Commission referred the case onto the European Court of Justice. The Court responded by issuing a ban on logging. In November 2017, the Court of Justice announced it would impose fines of at least €100,000 a day if Poland’s Environment Minister kept ignoring the Court’s decisions. By the end of November 2017, the loggers had withdrawn from the forest. In April 2018, the EU’s top court ruled that increased logging in Białowieża Forest violated EU law.

Overview of the forest sector

- CPI score: 56/100 (2020)
- Total forest cover: 9.24m ha (30%) (source: [Poland State Forests](#))
- Forest ownership: 85% state-owned; 13% privately-owned; 1.9% national parks; 0.1% experimental forest stations (source: [FSC](#))
- FSC certified: 6.66m ha (2021; source: [FSC](#))
- PEFC certified: 7.38m ha (2020; source: [PEFC](#))

FSC relevant criteria & indicators

- [FSC Forest Stewardship Standard for Poland](#)

Risk(s): Disregard for the Rule of Law in isolated incidences

Principle 1 – Compliance with laws and FSC principles

Criterion 1.1 Forest management shall respect all national and local laws and administrative requirements

Criterion 1.3 In signatory countries, the provisions of all binding international agreements such as CITES, ILO Conventions, ITTA and Convention on Biological Diversity, shall be respected.

PEFC relevant criteria & indicators (link)

- [PEFC National Standard](#)

Risk(s): Disregard for the Rule of Law in isolated incidences

Criterion 4.7 Compliance with legal requirements

4.7.1. Forest management shall comply with legislation, especially laws related to: forest management practices; nature and environmental protection; property ownership, tenure and land-use rights for indigenous people; health, health and safety at work issues; and the payment of charges and taxes.

4.7.2 The certified body shall guarantee the proper protection of the forest from such activities as the theft of wood, poaching, illegal logging, illegal land use, arson, and other illegal activities.

Russia

Summary of main risks

- Bribery
- Corruption
- Illegal salvage logging
- Lack of information due to state secrecy
- Weak enforcement of regulation



The [UNEP and WCMC](#) list compliance with legislation and bribery as major risks for illegality. According to the source, figures from the Russian Federal Forestry Agency (Roslezhhoz) as reported by GRID-Arendal demonstrate that between <1% and 10% of the total wood harvest is illegally cut every year; however, estimates from different sources range from 10% up to 60%.

[DW](#) reported in 2019 that part of the problem in controlling the felling of forests in Russia is the size of the country; there are millions of hectares of land where it is unclear whether the land is agricultural or forest. The source reports that a further impeding factor when it comes to having oversight of the state of Russia's forests is the fact that virtually all of the country's woodlands are under government ownership, with reports of illegal harvesting of forest sources downplayed or concealed.

Exports of wood from Russia to China comprise a substantial component of illegally logged timber; it is estimated that around 20% of the Russian wood exported to China is felled illegally. This has led to a [backlash](#) from the public.

In December 2020, it was [reported by Earthsight](#) that more than 100,000 tonnes of lumber linked to one of Russia's largest illegal logging scandals had entered Europe despite strict import laws and mounting evidence of wrongdoing. The timber entering Europe and linked to illegal logging was certified as legal and sustainable by PEFC. [PEFC](#) filed formal complaints against the companies involved with SGS, the relevant certification body. SGS investigated the complaint and reported that the investigations

Overview of the forest sector

- CPI score: 30/100 (2020)
- Total forest cover: 815m ha (49.8% forest cover) (source: [UNEP and WCMC](#))
- Forest ownership: 100% state-owned (source: [UNEP and WCMC](#))
- FSC certified: 51.1m ha (2021; source: [FSC](#))
- PEFC certified: 30.8m ha (2020; source: [PEFC](#))

"did not discover any indication by the BM Group within the scope of the PEFC FM certificates".

FSC [reported](#) in 2020 that illegal salvage logging was one of the most prevalent activities for obtaining illegal timber in Russia. The issue of salvage logging has also been highlighted by [WWF](#), and by [Preferred by Nature](#). In response, FSC reported that FSC Russia has launched a comprehensive research project to measure the likelihood and risks of illegal timber obtained through salvage logging entering FSC's supply chains.

FSC relevant criteria & indicators

- [FSC National Forest Stewardship Standard of Russian Federation](#)

Risk(s): Bribery and Corruption

Principle 1 – Compliance with laws

Criterion 1.7 The Organization shall publicize a commitment not to offer or receive bribes in money or any other form of corruption, and shall comply with anti-corruption legislation where this exists. In the absence of anti-corruption legislation, The Organization shall implement other anti-corruption measures proportionate to the scale and intensity of management activities and the risk of corruption.

1.7.1 An anti-corruption policy is developed and implemented that includes a commitment not to offer or receive bribes of any description and meets or exceeds applicable laws

1.7.2. The policy that contains The Organization’s anti-corruption commitments is publicly available at no cost.

1.7.3. Bribery, coercion and other acts of corruption do not occur.

1.7.4. If facts of bribery, coercion and other acts of corruption are identified corrective measures are implemented

Risk(s): Illegal salvage logging

Criterion 1.4 The Organization shall develop and implement measures, and/or shall engage with regulatory agencies, to systematically protect the Management Unit from unauthorized or illegal resource use, settlement and other illegal activities.

Risk(s): Weak enforcement of regulation

Criterion 1.5 The Organization shall comply with the applicable national laws, local laws, ratified international conventions and obligatory codes of practice, relating to the transportation and trade of forest products within and from the Management Unit, and/or up to the point of first sale.

PEFC relevant criteria & indicators

- [PEFC Forest Management Standard](#)

Risk(s): Illegal salvage logging

Principle 1 - Compliance with laws and international obligations of the Russian Federation

Criterion 1.1 Forest management shall comply with federal laws and laws of the subjects of the Russian Federation

Criterion 1.5 Forest management shall ensure proper protection of forest plots from illegal operations such as illegal cutting, illegal land use, illegally authorised fires and other illegal activities

Risk(s): Weak enforcement of regulation

Principle 1 - Compliance with laws and international obligations of the Russian Federation

Criterion 1.1 Forest management shall comply with federal laws and laws of the subjects of the Russian Federation

1.1.5. A procedure for making personnel aware on the contents of the legislative base is available.

1.1.6. A system for identifying violations of forest legislation and related laws is available

1.1.8. Timely corrective measures are taken to eliminate the causes and to mitigate the negative impacts of non-conformance with forestry legislation and related laws.

1.1.9. Orders, instructions and guidelines on elimination of causes and mitigation of consequences of violations of the law are in place.

1.1.10. A system for recording acts (including acts of comprehensive state audit), protocols of violations of environmental, forest and water legislation, is in place

Slovakia

Summary of main risks

- Illegal salvage logging
- Weak implementation of protections of areas and species



[WWF](#) report that lack of a strong legislative mandate for conservation threatens the unique value of Carpathian primeval beech forests in Slovakia, listed as a UNESCO World Heritage site. The NGO warned that under the current circumstances, the site's inscription in the World Heritage list may be threatened. Continuing inappropriate management, extensive logging and hunting in the Slovak forest threatened the whole UNESCO site. In July 2017, WWF called on the Slovak government to take urgent steps to define the borders of the Poloniny National Park territory and buffer zone, and to guarantee protection against logging and wildlife hunting through an integrated management plan which supports sustainable tourism in benefit of local communities and nature. [In 2020](#), the Slovakian Ministry of Environment agreed to create one of the largest nature reserves in the country as part of the boundary modification process of the Slovak components of the UNESCO World Heritage site.

[Fern](#) report that, despite 23% of the area of Slovakia being under protection – with nine National Parks, 14 Protected landscapes, Biosphere reserves, Natura 2000 sites and Important Bird Areas – an overreliance on salvage logging has caused irreparable damage to forest ecosystems. They report on a conflict of interest in which forest managers also manage protected areas, claiming that when ecologists and activists show that forest cover is decreasing, forest managers claim the opposite. One source of this discrepancy could be found in the way that salvage logging works in Slovakia. According to the Forest Act, salvage logging is allowed with prior approval by nature protection state administration bodies. All salvage logged areas must be afforested by natural or artificial regeneration within two years. During this period, the area continues

Overview of the forest sector

- CPI score: 49/100 (2020)
- Total forest cover: 2.01m ha (41.2% forest cover) (source: [Ministry of Agriculture and Rural Development of the Slovak Republic](#))
- Forest ownership: 55% state-owned; 7% privately-owned; 28.1% associated-owned; >1% church-owned; 8.5% municipality-owned (source: [FSC](#))
- FSC certified: 305,808ha (2021; source: [FSC](#))
- PEFC certified: 1.2m ha (2020; source: [PEFC](#))

to be considered a forest in alignment with FAO and national definitions, while environmental NGOs do not consider such areas to be forests.

FSC relevant criteria & indicators

- [International Generic Indicators](#)

Risk(s): Illegal salvage logging

Principle 1 – Compliance with laws

Criterion 1.4 The Organization shall develop and implement measures, and/or shall engage with regulatory agencies, to systematically protect the Management Unit from unauthorized or illegal resource use, settlement and other illegal activities.

Risk(s): Weak implementation of protections of areas and species

Principle 6 – Environmental values and impacts

Criterion 6.4. The Organization shall protect rare species and threatened species and their habitats in the Management Unit through conservation zones, protection areas, connectivity and/or (where necessary) other direct measures for their survival and viability. These measures shall be proportionate to the scale, intensity and risk of management activities and to the conservation status and ecological requirements of the rare and threatened species. The Organization shall take into account the geographic range and ecological requirements of rare and threatened species beyond the boundary of the Management Unit, when determining the measures to be taken inside the Management Unit.

Principle 9 – High conservation values

Criterion 9.3 The Organization shall implement strategies and actions that maintain and/or enhance the identified High Conservation Values. These strategies and actions shall implement the precautionary approach and be proportionate to the scale, intensity and risk of management activities.

PEFC relevant criteria & indicators

- [PEFC Criteria and indicators of sustainable forest management](#)

Risk(s): Illegal salvage logging

Principle 4 – Preservation, protection and adequate enhancement of biological diversity of forest ecosystems

Criterion 4.5. Leaving standing wood: Standing trees and dead wood shall be left in such quantities and distribution so that the existing biodiversity is maintained. Dead wood and left standing trees shall neither threaten forest visitors or the health and stability of standing forests and surrounding ecosystems.

Risk(s): Weak implementation of protections of areas and species

Principle 4 – Preservation, protection and adequate enhancement of biological diversity and forest ecosystems

Criterion 4.6 Forests of high environmental values: Forests that provide protection of forest ecosystems of high environmental values shall be managed by traditional methods, which led to their creation, or in accordance with special regulations

Criterion 4.7 Protected and endangered plant and animal species: Habitats of protected and endangered plants and animals shall be managed in a manner corresponding the ecological requirements of the protected species; their possible use for commercial purposes is governed by international law

Principle 7 – Compliance with legal requirements

Criterion 7.1 Applicable legislation: Forest management shall be in accordance with the legislation in the field of forestry, including methods of forest management, nature conservation and the environment of protected and endangered species, ownership, tenure and use rights of the local population, health, protection and safety at work and payment of fees and taxes.

Criterion 7.2 Prohibited activities: Forest management shall ensure adequate protection of forests against unauthorized activities

Ukraine

Summary of main risks

- Bribery
- Corruption
- Illegal logging
- Weak enforcement of regulation



In 2018, NGO Earthsight released a report, '[Complicit in Corruption: How billion-dollar firms and European governments are failing Ukraine's forests](#)'. The report alleged that illegality permeated the timber supply chain in Ukraine from harvest to export. Earthsight found rampant illegal logging in the beech forests of Velyky Bychkiv. Ukraine's State Environmental Inspectorate (SEI) confirmed that Velyky Bychkiv state forestry enterprise had illegally licensed 'sanitary' felling on more than 100 sites from April to June 2018. Such logging is banned by Ukrainian wildlife laws for several weeks during this period, because of the importance of the forests to breeding animals, including lynx and endangered bird species.

Earthsight's field studies revealed multiple breaches of regulations governing harvesting in every logging enterprise visited. There are currently major ongoing province-wide criminal corruption investigations relating to two of the three largest timber producing regions.

The UNEP and WMCM has [reported](#) that compliance with legislation and bribery are key risks associated with timber in Ukraine. In November 2018, EU experts issued a [Mission Report](#) describing the State Forest Resources Agency of Ukraine as "extensively prone to corruption".

The [BBC](#) has stated that up to 1/3 of logging in the Ukraine is illegal, and combined with climate change, has resulted in widescale floods this summer.

Overview of the forest sector

- CPI score: 33/100 (2020)
- Total forest cover: 9.7m ha (16.7%) (source: [Timber Trade Portal](#))
- Forest ownership: 99.8% publicly-owned; 0.2% privately-owned (source: [Timber Trade Portal](#))
- FSC certified: 4.48m ha (2021; source: [FSC](#))
- % PEFC certified: N/A

In 2019, [Earthsight](#) reported that EU demand for oak flooring was fuelling corruption and violence in Ukraine.

A follow-up 2020 [report](#) by Earthsight, in collaboration with [Channel 4](#), found illegal logging in FSC-certified supply chains in Ukraine. Focussed on the Carpathian forests, it found around 100 sites are being felled illegally each spring, when silence periods should protect several endangered animal species including brown bears, wolves and Eurasian lynx. While regulations require Environmental Impact Assessments (EIAs) before sanitary felling is conducted, no EIAs were found to have been carried out. Evidence cited by Earthsight includes the Ukrainian State Environmental Inspectorate (SEI), local environmental organisations, and research commissioned by WWF Germany.

FSC relevant criteria & indicators

- [FSC National Forest Stewardship Standard of Ukraine](#)

Risk(s): Bribery and Corruption

Principle 1 – Compliance with laws

Criterion 1.7 The Organization shall publicize a commitment not to offer or receive bribes in money or any other form of corruption, and shall comply with anti-corruption legislation where this exists. In the absence of anti-corruption legislation, The Organization shall implement other anti-corruption measures proportionate to the scale and intensity of management activities and the risk of corruption.

1.7.2. A systematic assessment of corruption risks in Organization's activity is conducted.

1.7.3. The policy meets or exceeds related legislation.

1.7.4. The anti-corruption policy signed by The Organization is publicly available* at no cost.*

1.7.5. Bribery, coercion and other acts of corruption do not occur.

1.7.6. Corrective measures are implemented if bribery, coercion and other acts of corruption do occur.

Risk(s): Illegal logging

Principle 1 – Compliance with laws

Criterion 1.4. The Organization shall develop and implement measures, and/or shall engage with regulatory agencies, to systematically protect the Management Unit from unauthorized or illegal resource use, settlement and other illegal activities.

Risk(s): Weak enforcement of regulation

Principle 1 – Compliance with laws

Criterion 1.3 The Organization shall have legal rights to operate in the Management Unit, which fit the legal status of The Organization and of the Management Unit, and shall comply with the associated legal obligations in applicable national and local laws and regulations and administrative requirements. The legal rights shall provide for harvest of products and/or supply of ecosystem services from within the Management

Unit. The Organization shall pay the legally prescribed charges associated with such rights and obligations.

1.3.1. All activities undertaken in the Management Unit are carried out in compliance with: 1) Applicable laws and regulations and administrative requirements, 2) Legal and customary rights; and 3) Obligatory codes of practice.

PEFC relevant criteria & indicators

- No PEFC NFCS currently exists for Ukraine



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