



Stakeholder Comment Received during Public Consultation of SFM Standard Revision 2024

Synopsis of Stakeholder Comments and Interim Response

Stakeholder Comment (Shri Suneel Pandey, VP ITC): Shri Suneel Pandey raised a critical concern regarding the inclusion of EUDR due diligence requirements in the PEFC and FSC Forest Management (FM) standards. He noted that if additional data collection and due diligence procedures related to EUDR compliance were to be incorporated into these standards, it would place a burden on all certificate holders, regardless of whether they are certified under PEFC or other related scheme. Specifically, he pointed out that simply following the PEFC or related FM standards may not suffice for EUDR compliance for specific consignments being exported to Europe.

Shri Pandey's suggestion was that it would be more effective to keep the EUDR compliance process separate from the existing PEFC and FSC standards. By doing so, it would remain neutral and flexible, allowing both FSC and PEFC certificate holders to meet the EUDR requirements without forcing changes to their existing certification standards. He recommended that NCCF's work on EUDR should remain independent to accommodate the business needs of both FSC and PEFC certificate holders.

Interim Response from A.K. Varma, Chairman: A.K. Varma acknowledged the importance and timeliness of Shri Pandey's suggestion, affirming that the revision of the standard was actively ongoing. He assured that further examination would be done regarding the points raised, and a follow-up would be provided in the coming days.

A.K. Varma also clarified that the process was not a blanket merger with PEFC standards. He emphasized that the approach would be country-specific and focused only on the essential and critical aspects required for compliance of NCCF FM Standard with PEFC FM document revised in view of EUDR.

Concluding remark: The matter raised by Shri Pandey will be further addressed in the upcoming 3rd SDG meeting, if necessary.

Inputs received from CAG (Certification Advisory Group) during the revision of FM scheme documents, specific to CB requirement document. Nov 2025

S. No.	Comment	Clause Number	Changes done in NCCF ACR Document
1	Where are we referring to MDs – they are mostly for MS	Normative References	The references related to MDs were deleted
2	Scheme Owner is globally accepted term	Clause 4: Role of NCCF, CB and NABCB:	The clause was updated as : Network for Certification and Conservation of Forests (NCCF): NCCF is a standard setting organization and which developed the standards for forest management certification of forest products and is the Scheme owner for FM certification
3	All SOs these days have programs for checking certificate holders through direct audits	Clause 5.1.1.3 (o)	The clause was updated as: Client's commitment to allow any visits/assessments by NCCF as the scheme owner either with the certification body or the accreditation body or by itself.
4	I am recommending these days to add separate requirements of Integrity and Independence which are mixed up in iso standards and now UNFCCC has also adopted them in their accreditation std – I have put these in ayush and coffee schemes	Clause 5.2 and 5.3	Clause 5.2 was added as Integrity Clause 5.3 was added as Independence
5	Do you want to give reference to ISO 17021-1 where risk based approach is a principle	Clause 5.6: Risk based approach	“Source: ISO 17021-1” was added in Clause 5.6(Risk based approach)
6	Should or shall – should is recommendatory	Clause 7.1.3	Clause 7.1.3 was updated as follows: The certification body <u>shall</u> ensure a workplace that is safe, provides equal opportunities, is non-discriminatory, promotes gender equality, and is free from workplace intimidation and harassment. Appropriate training and internal policies should be implemented.
7	Please rethink this – a non forestry decision maker along with expert is considered sufficient	Clause 7.4.2.2	Clause 7.4.2.2 was updated as follows: Certification decisions can be taken by one or more individuals with at least one of them

			having taken a formal forestry course.
8	This appeared earlier too =- please bring at one place	Clause 8.1 and Clause 5.9	Clause 8.1: Publicly available information was between CB and Client Clause 5.9: Publicly available information was between CB, NCCF and/or PEFC
9	This is also repeat	Clause 8.4 and Clause 5.5	Clause 8.4: Confidentiality was between CB and Client Clause 5.5: Confidentiality was between CB, NCCF and/or PEFC
10	We are not requiring management system	Clause 9.1.5.3(b)	Clause 9.1.5.3(b): “Mature Management system and no outstanding Major and Minor non- conformities from previous year audit.” was removed from the standard
11	Either we consistently use CB or full form – also is CB consistently not CBs		Replaced word “CBs” and “Certification Bodies” with word CB in the whole standard
12	Another repeat	Clause 12	Clause 12: Public Information is between CB and NCCF