

NETWORK FOR CERTIFICATION AND CONSERVATION OF FORESTS (NCCF)

Group Certification Standard

NCCF -STD- GM- 2.0 /2025

Network for Certification and Conservation of Forests (NCCF)

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Foreword

The Network for Certification and Conservation of Forests (NCCF) is a not for profit organization registered under Societies Registration Act, 1860. NCCF is involved in developing Forest Certification scheme in the country. It is an institutional mechanism to ensure collaborative and streamlined efforts for development of National Forest Certification System and Standards. It aims to promote the implementation of improved Forest practices in the country and further the development of healthier, sustainable: economically beneficial, environmentally responsible and socially appropriate in accordance with national policies, institutional frameworks and sustainability usage norms.

The Network for Certification and Conservation of Forests (NCCF) is the National Governing Body of the National Forest Certification Scheme and Standards (NFCSS) and has overall responsibility for the smooth working/functioning of the NFCSS while maintaining its credibility.

This document describes the requirements for the Group Certification in the NFCSS

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1. Scope

The document covers requirements for group certification against the NCCF Management Standards.

This document defines requirements for group certification systems and allow the certification of a number of forest owners/ managers under one certificate.

Group forest management certification requires establishing a specific management structure that includes the individual forest owners/managers. This entity represents the individual owners/managers in forest certification in order to ensure the correct implementation of the sustainable forest management standard and provide confidence in sampling-based certification activities

2. Normative references

The following referenced documents are indispensable for the application of this document. For both dated and undated references, the latest edition of the referenced document (including any amendment) applies

- 2.1 PEFC ST 1002:2010 PEFC Group Forest Management Certification Requirements
- 2.2 PEFC ST 1002:2018 PEFC Group Forest Management Certification Requirements
- 2.3 IAF MD 1:2007, Mandatory Document for the Certification of Multiple Sites Based on Sampling (IAF MD 1:2007)

3. Terms and Definitions

For the purposes of this document the terms and definitions given in ISO/IEC Guide 2:1996 apply together with the following definitions.

- **3.1 Affected stakeholder:** A stakeholder who might experience a direct change in living and/or working conditions caused by activities of the group organisation.
- Note 1: Affected stakeholders include neighbouring communities, indigenous people, workers, etc. However, having an interest in the subject matter of the standard (e.g. NGOs, scientific community, civil society) is not equal to being affected.
- Note 2: A stakeholder who might be a user of the standard is likely to become a certified entity, e.g. a forest owner in the case of a forest management standard, or a wood processing enterprise in the case of a chain of custody standard.
- **3.2** Audit: Systematic, independent, documented process for obtaining records, statements of fact or other relevant information and assessing them objectively to determine the extent to which specified

requirements are fulfilled.

- 3.3 **Certified area:** The forest area covered by a sustainable forest management system according to the PEFC Endorsed NCCF Sustainable Forest Management Standard.
- **3.4 Documented information:** Information required to be controlled and maintained by an organisation using any format and media, from any source.
- 3.5 **Document confirming participation in group forest certification:** A document issued to an individual **participant** that refers to the **group forest certificate** and that confirms the **participant/member** as being covered by the scope of the **group forest certification**.
- 3.6 **Forest Owner/Manager**: Person, group of people or legal entity having the legal or tenure right, or executing traditional or customary tenure rights, to manage the forest in a clearly defined certified area, and the ability to implement the requirements of the sustainable forest management standard in this area.
- 3.7 **Group entity:** A legal entity/individual that represents the **participants**, with overall responsibility for ensuring the conformity of forest management in the **certified area** to the sustainable forest management standard and other applicable requirements of the forest certification system .

Note: The structure of the group entity should follow the operations, number of participants and other basic conditions for the group organisation. It may be represented by one person.

- **3.8 Group forest certificate :** A document confirming that the **group organisation** complies with the requirements of the sustainable forest management standard and other applicable requirements of the forest certificationsystem .
- **3.9 Group forest certification :** Certification of the group organisation under one group forest certificate.
- **3.10 Group management plan:** Documented information specifying objectives, actions and control arrangements. It covers planned changes of the group management system and requirements of the sustainable forest management standard which are covered on group level.
- **3.11 Group management system:** Set of interrelated or interacting elements of an organisation to achieve the objectives and outcomes of the sustainable forest management standard.

3.12 Group organisation: A group of **participants** represented by the **group entity** for the purposes of implementation of the sustainable forest management standard and its certification. A binding written agreement shall be established between a participant and the group entity.

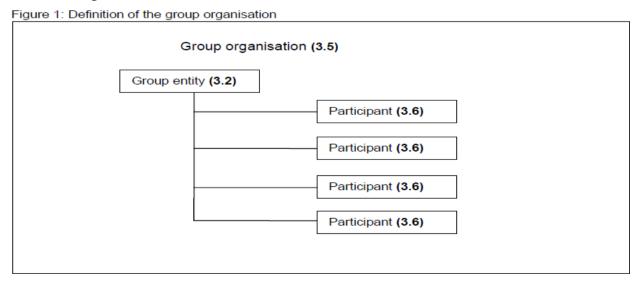
Note1: The term "group organisation" is equivalent to the term "regional organisation" if the group is defined by regional boundaries or other terms chosen by the relevant forest certification scheme and complying with the content of this definition.

- **3.13 Internal Audit:** Systematic, independent, documented process for obtaining records, statements of fact or other relevant information and assessing them objectively to determine the extent to which specified requirements are fulfilled, undertaken by the group organisation itself (first party audit).
- **3.14 Monitoring:** Determining the status of a system, a process or an activity.
- **3.15 Organisation:** Person or group of people that has its own functions with responsibilities, authorities and relationships to achieve its objectives.
- **3.16 Participant/ Group Members**: A forest and/or landowner/manager covered by the **group forest certificate**, who has the ability to implement the requirements of the sustainable forest management standard in a certified area.

Eligibility - NCCF group certification standard does not allow a group member to be part of more than one group entity certification or individual forest management certification.

Note1: The term "ability to implement the requirements of the management standard" requires the entity to have a long-term legal right, tenure right or traditional or customary tenure rights to manage the forest and would disqualify one-off contractors from becoming participants in group forest management certification.

Note 2: The relationship between the terms "group organisation", "group entity" and "participant" is shown in **Figure 1.**



- **3.17 Policy:** Intentions and direction of an organisation, as formally expressed by its manager/owner or the group entity.
- **3.18 Stakeholder:** A person, group, community or organisation with an interest in the subject of the requirements of the standard.
- **3.19. Landscape level requirements:** Requirements of the applicable standard that are implemented at the level of the group entity in a management group (e.g. protection of high conservation values).

4. Context of the group organisation

4.1 Understanding the group organisation and its context

To understand external and internal issues of the group organisation a general framework shall include information regarding: :

- a) regional groups: group of forest owners/managers defined by regional borders and
- b) other groups and/or
- c) whether there are any other specific circumstances which influence the implementation of the group management system.

4.2 Understanding the needs and expectations of affected stakeholders

- 4.2.1 The group organisation shall identify:
 - a) the affected stakeholders that are relevant for the group management system and
 - b) the relevant expectations of these affected stakeholders.

4.3 Determining the scope of the group management system

- 4.3.1 The group management system provides definitions relating to the following terms, which are in conformity with the definitions of those terms presented in Terms and Definitions:
 - a) the group organisation and the elements of the group organisation (group entity and participant),
 - b) the certified area,
 - c) the group certificate and
 - d) the document confirming participation in group certification.
- 4.3.2 The establishment of the scope for the group management system the boundaries and applicability of the group management system shall be determined.

4.3.3 The group management system shall define which requirements of the sustainable forest management standard may be fulfilled on group level.

4.3.4 The group management sytem requires that the scope shall be made available as documented information.

4.4 Group management system

4.4.1 The group management system requires that all participants shall be subject to the internal monitoring and the internal audit programme.

4.4.2 The group management system requires that a certified PEFC chain of custody system shall be in place if a group entity acts as a trader of forest based material not covered by group certificate.

5. Leadership

5.1 General requirements for the Group Organisation

The participants of a group forest certification shall be managed by a group organisation that is centrally administered to ensure participants' conformity with the sustainable forest management standard and is subject to central review, and that all the participants shall be subject to an internal monitoring programme.

5.1.1 The group organisation shall be an independent legal organisation , registered committees, cooperatives, societies or an individual acting as a legal entity.

5.1.2 Clear definitions shall be provided for the following terms, which are in conformity with the definitions present in PEFC ST1002:2018 and in this standard

- a) the group organisation and the elements of the group organisation (group entity and participant),
- b) the certified area,
- c) the group certificate and
- d) the document confirming participation in group certification

- 5.1.3 The organisation shall comply with the applicable and relevant legal obligations
- 5.1.4 The organisation shall operate an annual internal monitoring programme that provides for the evaluation of the participants' conformity with the certification requirements,
- 5.1.5 The Group organisation shall define training needs and implement training activities and/or communication strategies relevant to the implementation of the applicable NCCF standards.
- 5.1.6 The Group organisation shall operate a review of conformity with the sustainable forest management standard, that includes reviewing the results of the internal monitoring programme and the certification body's evaluations and surveillance; corrective and preventive measures if required; and the evaluation of the effectiveness of corrective actions taken.

Note: The requirement for "written agreement" and participants' "commitment" is also satisfied by the written agreement of the forest or land owners/managers' association with the group entity, where the forest or the land owners/managers' association can demonstrate that it has a legal mandate to represent the participants and where its commitment and the terms and conditions of the written agreement are enforceable.

5.2 Roles, Responsibilities and authorities

5.2.1 Responsibilities and Functions of the Group Entity

Following functions and responsibilities of the group entity shall be specified:

- a) The group entity shall implement and maintain an effective management system covering all participants of the group;
- b) The group entity shall represent the group organisation in the certification process, including in communications and relationships with the certification body, submission of an application for certification, and contractual relationship with the certification body;
- c) The group entity shall establish written procedures for the management of the group organisation;
- d) The group entity shall establish written procedures for the acceptance of new participants of the group organisation. These acceptance procedures shall cover at least the verification of the applicant's information about contact details, clear identification of their forest property and its/their size(s);
- e) The group entity shall establish written procedures for the suspension and exclusion of participants who do not correct/close nonconformities. Group participants excluded from any certification group based on nonconformities cannot be accepted within 12 months after exclusion
- f) to keep documented information of:
 - i. the group entity and participants' conformity with the requirements of the sustainable forest management standard, and other applicable requirements of the forest certification system,
 - ii. all participants, including their contact details, identification of their forest property and its/

their size(s),

iii. the certified area.

iv. the implementation of an internal monitoring programme, its review and any preventive and/or corrective actions taken;

g) The group entity shall establish connections with all participants based on a binding written agreement which shall include the participants' commitment to comply with the sustainable forest management standard. The group entity shall have a written contract or other written agreement with all participants covering the right of the group entity to implement and enforce any corrective or preventive measures, and to initiate the exclusion of any participant from the scope of certification in the event of nonconformity with the sustainable forest management standard;

Note: The requirements for "participant' commitment" and "written contract or other written agreement with all participants" may also be satisfied by the commitment of and written agreement of a pre-existing organisation or group or the members participation, such as a forest owners'/managers' association, SFM programme and submission to tax programming, where the organisation can demonstrate that it has a legal mandate to represent the participants and where its commitment and the terms and conditions of the contract are enforceable.

- h) The group entity shall provide all participants with a document confirming participation in the group forest certification;
- i) The group entity shall provide all participants with information and guidance required for the effective implementation and maintenance of the sustainable forest management standard and other applicable requirements of the forest certification system;
- j) The group entity shall address nonconformities reported from group members which were identified under other PEFC certifications than the particular group certification and to ensure implementation with all group members;
- k) The group entity shall operate an internal monitoring programme that provides for the evaluation of the participants' conformity with the certification requirements;
- I) The group entity shall operate an annual internal audit programme covering both group members and group entity;
- m) The group entity shall operate a management review of the group forest certification and acting on the results from the review:
- n) The group entity shall to provide full co-operation and assistance in responding effectively to all requests from the certification body, accreditation body, PEFC International or the National Governing Body for relevant data, documentation or other information; allowing access to the forest area covered by the group organisation and other facilities, whether in connection with formal audits or reviews or otherwise related or with implications for the management system.

5.2.2 The function and responsibilities of the participants are as follows:

a) To provide the group entity with a written agreement, including a commitment on conformity

with the applicable standard and other applicable requirements of the NFCS, group participants excluded from any certification group cannot apply for group membership within 12 months after exclusion;

Note: The requirement for "written agreement" and participants' "commitment" is also satisfied by the written agreement of the forest owners/managers' association with the group entity, where the forest/landowners/managers' association can demonstrate that it has a legal mandate to represent the participants and where its commitment and the terms and conditions of the written agreement are enforceable.

- b) To comply with the applicable standard requirements and other applicable requirements of the NFCSS;
- c) To provide full co-operation and assistance in responding effectively to all requests from the group entity or certification body for relevant data, documentation or other information; allowing access to the area and other facilities, regarding formal audits or reviews or otherwise;
- d) To implement relevant corrective and preventive actions established by the group entity.
- e) To provide the group entity with information about previous group participation;
- f) To inform the group entity about nonconformities identified under other NCCF certifications than the particular group certification;

5.2.3 Group Records

- 5.2.3.1 The group entity shall maintain up-to-date records the group entity and participants' conformity with the requirements of the sustainable forest management standard, and other applicable requirements of the NFCS, including but not limited to:
 - List of names and contact details of Participants, together with dates of entering and leaving the Group scheme, reason for leaving, and identification of their forest property and its/their size(s),
 - II. Any records of training provided to staff or Participants, relevant to the implementation of this standard and applicable NCCF standard;
- III. the certified area, map or supporting documentation describing or showing the location of the member's forest properties;
- IV. Evidence of consent of all Participants;
- V. Documentation and records regarding recommended practices for forest management (i.e. silvicultural systems); taken to correct any such non-compliance;
- VI. the implementation of an internal monitoring programme, its review and any preventive

and/or corrective actions taken.

VII. Records of the estimated annual overall NCCF production and sales of the Group.

NOTE: The amount of data that is maintained centrally by the Group entity may vary from case to case.

In order to reduce costs of evaluation by the certification body, and subsequent monitoring by NCCF, data should be stored centrally wherever possible.

- 5.2.3.2 Group records shall be retained for at least five (5) years.
- 5.2.3.3 Group entities shall not issue any kind of certificates or declarations to their participants that could be confused with NCCF certificates. Participant certificates may however be requested from the certification body.

5.2.4 Group Size

- 5.2.4.1 There is no restriction on the maximum size that a group certificate can cover in terms of number of group members, their individual area property size or total area to brought under certification. The Group entity shall have sufficient human and technical resources to manage and control the Group in line with the requirements of this standard.
- 5.2.4.2 The Group entity shall specify in their procedures the maximum number of members that can be supported by the management system and the human and technical capacities of the Group entity.

5.3 Commitment and Policy

- 5.3.1 The group entity shall provide a commitment:
 - a) to comply with the sustainable forest management standard and other applicable requirements of the certification system;
 - b) to integrate the group certification requirements in the group management system;
 - c) to continuously improve the group management system;
 - d) to continuously support the improvement of the sustainable management of the land/forests by the participants.
- 5.3.2 The commitment of the group entity may be part of a group management policy and shall be publicly available as documented information upon request.
- 5.3.3 The participants shall provide a commitment
 - a) to follow the rules of the management system;
 - b) to implement the requirements of the sustainability standard in their operations in their area

6. Planning:

- 6.1. If a group organisation plans any changes in the group management system, these changes shall be included in a group management plan.
- 6.2. If a group organisation decides to fulfill requirements of the sustainable forest management standard on the group level, these requirements shall be considered in a group management plan.

7. Support:

- 7.1 The resources required by the group organisation for the establishment, implementation, maintenance and continual improvement of the group management system shall be determined and provided.
- 7.2 The group organisation shall define the necessary competence of persons doing work in the group management system.
- 7.3 The communication processes of the group organisation shall be in place to raise the awareness of participants concerning:
 - a) the group management policy;
 - b) the requirements of the sustainable forest management standard;
 - c) their contribution to the effectiveness of the group management system and the sustainable forest management, including the benefits of improved group performance;
 - d) the implications of not conforming with the group management system requirements.
- 7.4 The internal and external communications relevant to the group management system shall be determined. This includes:
 - a) on what to communicate;
 - b) when to communicate;
 - c) with whom to communicate;
 - d) how to communicate.
- 7.5 The appropriate mechanisms shall be in place for resolving complaints and disputes relating to group management and sustainable forest management operations.
- 7.6 The documented information relevant to the group management system and the conformance with the requirements of the sustainable forest management standard is:
 - a) up to date;
 - b) available and suitable for use, where and when it is needed;

c) adequately protected against loss of confidentiality, improper use, or loss of integrity

8. Operation:

- 8.1 The group organisation shall plan, implement and control processes needed:
 - a) to meet the requirements of the group certification standard and the sustainable forest management standard and
 - b) to implement the actions determined in
- 8.2 The planning, implementing and controlling shall be done by:
 - a) defining the necessary processes and establishing criteria for those;
 - b) implementing control of the processes in accordance with the criteria;
 - c) keeping documented information to the extent necessary to have confidence that the processes have been carried out as planned.

9. Performance evaluation:

- 9.1 Monitoring, measurement, analysis and evaluation
- 9.1.1 An ongoing internal monitoring programme provides confidence in the conformity of the group organisation with the sustainable forest management standard. In particular, it shall be determined:
 - a) what shall be monitored and measured;
 - b) the methods for monitoring, measurement, analysis and evaluation, as applicable, to ensure valid results;
 - c) when the monitoring and measuring shall be performed;
 - d) when the results from monitoring and measurement shall be analysed and evaluated;
 - e) what documented information shall be available as evidence of the results.
- 9.1.2 The group entity shall evaluate the group management performance and the effectiveness of the group management system concerning the implementation of the sustainable forest management requirements.

9.2 Internal audit

9.2.1 Objectives

- 9.2.1.1 An annual internal audit programme shall provide information on whether the group management system:
 - a) conforms to
 - i. the group organisation's own requirements for its group management system;
 - ii. the requirements of the national group certification standard;

- b) ensures the implementation of the sustainable forest management standard on the participant level;
- c) is effectively implemented and maintained.
- 9.2.1.2 An internal audit programme shall cover the group entity and all group participants. The group entity shall be audited annually. The participants may be selected on a sample basis.

9.2.2 Organisation

The internal audit programme shall cover at least:

- a) planning, establishing, implementing and maintaining an audit programme(s) including the frequency, methods, responsibilities, planning requirements and reporting, which shall take into consideration the importance of the processes concerned and the results of previous audits;
- b) definition of the audit criteria and scope for each audit;
- c) competence of internal auditor (forest knowledge, standard knowledge);
- d) selection of auditors and conducting of audits to ensure objectivity and the impartiality of the audit process;
- e) ensuring that the results of the audits are reported to relevant group management;
- f) retaining of the documented information as evidence of the implementation of the audit programme and the audit results.

9.3 Selection of participants in the internal audit programme

9.3.1 General

- 9.3.1.1 The establishment of requirements for the selection of participants in an internal audit programme along with the certification. These requirements shall include the following procedures for:
 - a) determination of the sample size (9.3.2);
 - b) determination of sample categories(9.3.3);
 - c) distribution of the sample to the categories (9.3.4);
 - d) selection of the participants (9.3.5).
- 9.3.1.2 The additional requirements on the regional, national or sub-national level shall be defined.
- 9.3.1.3 The additional sampling requirements in case of participation of pre-existing organisations or group or the members participation, such as a forest owners'/managers' association, SFM programme and submission to tax programming which have their own members, shall be defined.

9.3.2 Determination of the sample size

- 9.3.2.1 The sample size shall be calculated for the participants of the group organisation.
- 9.3.2.2 The size of the sample generally should be the square root of the number of participants: (y=vx), rounded to the upper whole number.
- 9.3.2.3 The size of the sample may be adapted by a standard taking into account one or more of the following indicators:
 - a) results of a risk assessment. In this case deviations of sample sizes in case of low or high risk for individual categories shall be defined;
 - b) results of internal audits or previous certification audits;
 - c) quality / level of confidence of the internal monitoring programme;
 - d) use of technologies allowing the gathering of information concerning specified requirements; Note: Such technologies may be e.g. the use of satellite data or drones and allow compliance statements for specific requirements of a sustainability standard or support the risk based sampling.
 - e) based on other means of gathering information about activities on the ground.

Note: One way could be a survey with participants who provide some information about their activities on the ground.

9.3.3 Determination of sample categories

- 9.3.3.1 The sample categories shall be established based on the results of a risk assessment. The indicators used in the risk assessment shall reflect the geographical scope of the standard. The following non exhaustive list of indicators may be used for the risk assessment:
 - a) ownership type (e.g. state forest, communal forest, private forest);
 - b) size of management units (different size classes);
 - c) biogeographic region (e.g. lowlands, low mountain range, high mountain range);
 - d) operations, processes and products of potential group participants;
 - e) deforestation and forest conversion;
 - f) rotation period(s);

- g) richness of biological diversity;
- h) recreation and other socio-economic functions of the forest;
- i) dependence of and interaction with local communities and indigenous people;
- j) available resources for administration, operations, training and research;
- k) governance and law enforcement.
- 9.3.3.2 Conditions which constitute risk for each indicator on low, medium and high level and the respective consequences for the sampling shall be defined.

9.3.4 Distribution of the sample

The sample shall be distributed to the categories according to the result of the risk assessment.

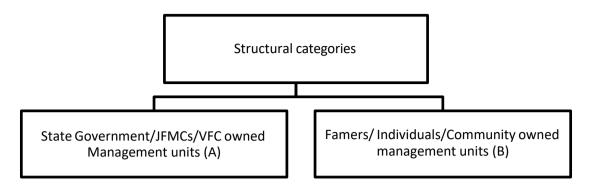
9.3.5 Selection of the participants

- 9.3.5.1 At least 25% of the sample should be selected at random.
- 9.3.5.2 A risk-based procedure for the selection of the participants shall be specified.

9.3.6 Selection of Participants for the audit program

Selection of sample categories

The sampling selection starts with establishing the different sample categories that can be covered under the scope of the group certification. A sampling for audit purposes will be done based on the certain structural indicators like — types of ownership and size of the management unit. Based on these categories two types categories are defined for the identification of the sample categories namely- Category A, Management units owned by Government and Category B, Management Units owned by the farmers. Examples for Category A can include- State Forest Department/Corporation as the Group entity taking the legal representation of the different administrative forest divisions or circles for the certification purpose. Here, the administrative divisions and circles will be the participants. On the other hand, a group entity representing conglomeration management units owned by individuals, farmers, community can under category B.



Selection of sample size

The sample size shall be calculated separately for each sample category.

The sample size is calculated using Table 1 for all sets of 'like' management units –

Table 1. Sample Category and number of management units to be evaluated

Sample category	Size Class (ha)- (X)	Main evaluation	Surveillance	Re-evaluation
Category (A)	>15,000	S = X	S = 0.7*X	S = 0.7*X
Management Units	1,000-15,000	S = 0.4*X	S = 0.2*X	S = 0.3*X
Category (B)	100-1,000	S = 0.8*√X	S=0.6*√X	S=0.6*√X
Management Units	Less than 100	S = 0.6*√X	S=0.3*√X	S=0.4*√X

S is the management units that must be evaluated and must be rounded to the upper whole number to determine the number of units to be sampled. X is the total number of the management units in a set of categories.

- 6.2.3 Each FMU within the group shall have been visited on-site by the certification body at least once in a certificate cycle.
- 6.2.4 Also, at least 25% of the samples shall be selected randomly from the calculated units.

9.4 Management review

- 9.4.1 An annual management review shall at least include:
- a) the status of actions from previous management reviews;
- b) changes in external and internal issues that are relevant to the group management system;
- c) the status of conformity with the sustainable forest management standard, that includes reviewing the results of the internal monitoring programme, the internal audit and the certification body's evaluations and surveillance;
- d) information on the group performance, including trends in:
 - i. nonconformities and corrective actions;

- ii. monitoring and measurement results;
- iii. audit results;
- e) opportunities for continual improvement.
- 9.4.2 The management review shall include decisions related to continual improvement opportunities and any need for changes to the group management system.
- 9.4.3 The group organisation shall retain documented information as evidence of the results of management reviews.

10. Improvement

10.1 Nonconformity and corrective action:

- 10.1.1 The group organization shall exclude the nonconformity when the following occurs::
 - a) react to the nonconformity and, as applicable:
 - i. take action to control and correct it;
 - ii. deal with the consequences;
 - b) evaluate the need for action to eliminate the causes of the nonconformity, in order that it does not recur or occur elsewhere, by:
 - i. reviewing the nonconformity;
 - ii. determining the causes of the nonconformity;
 - iii. determining if similar nonconformities exist, or could potentially occur;
 - c) implement any action needed;
 - d) review the effectiveness of any corrective action taken;
 - e) make changes to the group management system, if necessary.
- 10.1.2 The group organisation shall retain documented information as evidence of:
 - a) the nature of the nonconformities and any subsequent actions taken;
 - b) the results of any corrective action.
- 10.1.3 that a participant who was excluded from a group certification shall be internally audited by the group entity before it is allowed to re-enter the group certification. The internal audit shall not take place sooner than 12 months after the exclusion.

10.2 Continual improvement

The suitability, adequacy and effectiveness of the group management system and the sustainable management of the forest shall be continuously improved.

11. Chain of Custody

- a) The Group entity shall have in place a documented system for tracking and tracing of certified products produced by the participants from certified area.
- b) The Group entity should take measures to ensure that Non-certified material is not being mixed with NCCF certified material.
- c) The Group entity shall ensure that all uses of the NCCF and PEFC Trademark are approved by the certification body in advance.
- d) Tracking and traceability systems should as per the PEFC Chain of Custody requirements.