

**Summary of comments and proposals
to the first version of draft standard ST-01-20XX
ST-01-20XX**

SUSTAINABLE FOREST MANAGEMENT. GENERAL PROVISIONS

1 Comment on the reasonableness of standard development

Comment, proposal	Developer's conclusion
No comments were received	

2 Comment on the draft standard as a whole

Comment, proposal	Developer's conclusion
There are no comments on the PEFC Sustainable Forest Management Standard in Ukraine	<u>Taken note</u>

3 Comment on the scope of standard

Comment, proposal	Developer's conclusion
<p>Forest use is the integral part of sustainable forest management. The first sentence should be worded as follows: The standard establishes the basic provisions of sustainable forest management and forest use, intended to the ensuring of high productivity and stability of forests, conservation and restoration of forest biodiversity, minimization or elimination of negative effects of forestry production on the environment, sustainable forest use, strengthening of economic efficiency of forestry production, its social function.</p>	<p style="text-align: center;"><u>Accepted</u></p> <p>The first sentence should be worded as follows: The standard establishes the basic provisions of sustainable forest management, intended to the ensuring of high productivity and stability of forests, conservation and restoration of forest biodiversity, minimization or elimination of negative effects of forestry production on the environment, sustainable forest use, strengthening of economic efficiency of forestry production, its social function.</p>

4 Comment on the structure of standard

Comment, proposal	Developer's conclusion
<p>Wording Criterion 1. It is reasonable to replace it with Criterion 8.1. Wording Criterion 2. It is reasonable to replace it with Criterion 8.2 etc. It is reasonable to continue to use the term Criterion for all Principles or completely remove it from the text of the version. It is worth noting in the whole text the Criterion in accordance with the Principle. In this case, it is reasonable to either remove the expression Criterion throughout the text, or number it in accordance with the Principle.</p>	<p>Accepted partly, to add numbering to the criteria: 8.1 Criterion 1 etc. The PEFC forest management certification system is based on six criteria of sustainable forest management, the term "Principle" is not used in this context.</p>

5 Comments on some structural elements of the draft standard

Structural element of the standard	Comment, proposal	Developer's conclusion
Normative references	It is necessary to add the relevant current laws and regulations of Ukraine To provide reference to the Forest Code of Ukraine	<u>Rejected</u> due to the possibility of frequent changes in Ukrainian legislation
Terms and Definitions	The term "afforestation" has inaccuracies, both terminological and syntactic. The term "afforestation" should be worded as follows: "Establishment of forest by planting and / or special sowing, intentional sowing or in natural way on the plot that previously was another type of land use and transferred , provides for the transition from non-forest land to forest use for forestry needs " FAO definition – AFFORESTATION - Establishment of forest through planting and/or deliberate seeding on land that, until then, was not classified as forest. Explanatory note 1. Implies a transformation of land use from non-forest to forest	<u>Accepted partly</u> To state the term in the following wording: Afforestation Establishment of forest through planting and/or deliberate seeding or natural expansion of forest on land that, until then, was under a different land use, implies a transformation of land use from non-forest to forest (source: based on FAO 2018).
	The term " Biological control agents " The phrase "Biological control agents" is best translated as "biological pest management agents" rather than control. In addition, in fact, these are biological factors that destroy pests, not "populations of other organisms." The term should be worded as follows: "A biological control agent is an organism, such as an insect or plant disease, that is used to control a pest species " Convention on biological diversity "Biological control, often referred to as "biocontrol", is a method of reducing or eliminating the impact or damage caused by a target pest or weed using a biocontrol agent, traditionally a predator, herbivore or pathogen" https://www.cbd.int/doc/c/0c6f/7a35/eb8815eff54c3bc4a02139fd/cop-14-inf-09-en.pdf	<u>Accepted partly</u> To state the term in the following wording: Biological control agents Living organisms used to eliminate or regulate the populations of pests and diseases (Source: based on World Conservation Union (IUCN)).
	Certified area. In addition to PEFC, there are other certification schemes, so the common standard should not specify a specific certification scheme. The term should be worded as follows: Certified forest area - Forest area covered by the sustainable forest management system in accordance with the PEFC standard for sustainable	<u>Rejected.</u> the PEFC standard is being developed

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	<p>forest management (PEFC-ST-1003). on which the quality of forest management and production has been confirmed by an independent third party in accordance with the approved criteria". Forest certification is a voluntary process whereby an independent third party (the "certifier") assesses the quality of forest management and production against a set of requirements ("standards") predetermined by a public or private certification organization.</p> <p>http://www.fao.org/sustainable-forest-management/toolbox/modules/forest-certification/further-learning/en/?type=111.</p>	
	<p>Degraded forest.</p> <p>There are three different concepts - forest degradation, degraded forest and degraded forest lands. And in this case we have the definition of degraded forest, which is defined as "land".</p> <p>The term should be worded as follows: "Land with a long-term significant reduction in the overall capacity to benefit from forests such as carbon, wood, biodiversity and other goods and services (Source: Based on FAO, 2003)."</p> <p>Degraded Forest - Forest that delivers a reduced supply of goods and services from a given site and maintains only limited biological diversity. It has lost the structure, function, species composition and /or productivity normally associated with the natural forest type expected at that site ITTO, 2002</p> <p>https://www.cifor.org/rehab/_ref/glossary/Degraded Forest.htm</p>	<p><u>Accepted</u></p> <p>To state the term in the following wording:</p> <p>Degraded forest</p> <p>Forest that delivers a reduced supply of goods and services from a given site and maintains only limited biological diversity. It has lost the structure, function, species composition and /or productivity normally associated with the natural forest type expected at that site (Source: ITTO, 2002</p> <p>https://www.cifor.org/rehab/_ref/glossary/Degraded Forest.htm)</p>
	<p>Ecosystem services.</p> <p>Based on the Millennium Ecosystem Assessment, the definition can be broader and more reasoned.</p> <p>The term should be worded as follows:</p> <p>Ecosystem services – Benefits obtained from ecosystems. These include:</p> <ul style="list-style-type: none"> - provisioning services such as food, water, timber, fibre, fuel, genetic resources etc.; - regulating services that affect climate and macroclimate (incl. affects the productivity of crops), 	<p><u>Accepted</u></p> <p>To state the term in the following wording:</p> <p>Ecosystem services</p> <p>Ecosystem services - benefits obtained from ecosystems. These include:</p> <ul style="list-style-type: none"> - provisioning services such as food, water, timber, fibre, fuel, genetic resources etc.; - regulating services that affect climate and macroclimate (incl. affects the productivity of crops), protection against floods and other natural disasters,

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	<p>protection against floods and other natural disasters, disease control, absorption of human waste, water and air purification, pest control;</p> <p>- cultural services that provide enrichment of cultural, spiritual and aesthetic aspects of human well-being: emotions from communication with nature, sense of terrain, environment for the formation of lifestyle, customs and traditions;</p> <p>- supporting services that provide the existence of ecosystems: soil formation, primary productivity, basic biogeochemical processes (nutrient cycle, photosynthesis), environmental conditions.</p> <p>https://www.millenniumassessment.org/documents/document.300.aspx.pdf</p> <p>Forest cultures. There is no such term in English. Change the English name of the term to "Artificially regenerated forest"</p>	<p>disease control, absorption of human waste, water and air purification, pest control;</p> <p>- cultural services that provide enrichment of cultural, spiritual and aesthetic aspects of human well-being: emotions from communication with nature, sense of terrain, environment for the formation of lifestyle, customs and traditions;</p> <p>- supporting services that provide the existence of ecosystems: soil formation, primary productivity, basic biogeochemical processes (nutrient cycle, photosynthesis), environmental conditions.</p> <p>(Source: Based on R. Hassan, R. Scholes and N. Ash. 2005. Ecosystems and Human Well-being: Synthesis. The Millennium Ecosystem Assessment Series. Island Press, Washington DC, https://www.millenniumassessment.org/documents/document.300.aspx.pdf).</p> <p><u>Accepted</u></p> <p>To state the term in the following wording: Artificially regenerated [established] forest Forest stands established by planting of seedlings, saplings, cuttings of trees and shrubs or by sowing of their seeds (National Standard of Ukraine DSTU 2980).</p>
Terms and definitions	<p>Affected stakeholder</p> <p>Note 1. Delete NGO because the abbreviation is not mentioned anywhere else.</p> <p>Note 1. Affected stakeholders include local communities, employees of the Organization and service providers (contractors), adjacent land users registered in local communities, local processors of forest products, etc. (the list is not exhaustive). However, having an interest in the subject matter of the standard (e.g. NGOs, scientific community, civil society) is not equal to being affected.</p> <p>Biological diversity</p> <p>Ecologically important forest areas</p> <p>Imperfect translation and interpretation of terms and definitions:</p> <p>"diversity within species, between species ..."</p> <p>"rare, sensitive or representative ecosystems ..."</p>	<p><u>Accepted</u></p> <p>To state the term in the following wording: Note 1. Affected stakeholders include local communities, employees of the Organization and service providers (contractors), adjacent land users registered in local communities, local processors of forest products, etc. (the list is not exhaustive). However, having an interest in the subject matter of the standard (e.g. NGOs, scientific community, civil society) is not equal to being affected.</p> <p><u>Rejected</u></p> <p>Biological diversity</p> <p>The definition is provided in accordance with the official Ukrainian translation of the Convention on Biological Diversity (https://zakon.rada.gov.ua/laws/show/995_030), i.e.</p>

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	<p>"species listed in the Red Book of Ukraine and their habitats"; "Contributing to globally, regionally and nationally significant large landscapes"; "species listed in the annexes to the Convention"; Replace with: "Diversity within a species, among species..."; "rare, sensitive or representative ecosystems"; "species listed in the Red Book of Ukraine and their habitats"; "Contributing to globally, regionally and nationally significant large landscapes"; "species listed in the annexes to the Convention";</p>	<p>it is part of Ukrainian legislation. <u>Accepted partly</u> To state the term in the following wording: Ecologically important forest areas Forest areas a) Containing protected, rare, sensitive or representative forest ecosystems that are objects of conservation in their natural state within the territories and objects of the Natural Conservation Fund (according to the Law of Ukraine "On the Nature Conservation Fund of Ukraine"); b) Containing significant concentrations of endemic and endangered species listed in the Red Book of Ukraine and their habitats (according to the Law of Ukraine "On the Red Book of Ukraine"); c) Containing endangered or protected in situ genetic resources - genetic reserves (according to "Guidelines for Forest Seed Breeding"); d) Contributing to globally, regionally and nationally significant large landscapes with natural distribution and abundance of naturally occurring species - primary forests, quasi-primary forests, natural forests (according to the Law of Ukraine "On the Amendments to Certain Legislative Acts of Ukraine Concerning the Conservation of Virgin Forests in Accordance with the Framework Convention on the Protection and Sustainable Development of the Carpathians"); e) which are Emerald Network areas, habitats in need of special conservation measures in accordance with Resolution 4, as well as habitats of species listed in the annexes to the Convention on the Conservation of European Wildlife and Natural Habitats (according to the Law of Ukraine "On the Accession of Ukraine to the 1979 Convention on the Conservation of European Wildlife and Natural Habitats"); and further on the text of the basic definition</p>
	<p>Exotic spp The above definition and translation of the name itself does not correspond to the introduced species</p>	<p><u>Accepted</u> To state the term in the following wording: Introduced species - A species occurring in an</p>

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	<p>- deliberately migrated or acclimatized by humans. Introduced species - A species occurring in an area outside of its historically known natural range as a result of intentional or accidental dispersal by human activities. Also known as alien species (Source: http://iufro-archive.boku.ac.at/iufro/silvavoc/glossary/29_0en.html)</p>	<p>area outside of its historically known natural range as a result of intentional or accidental dispersal by human activities. Also known as alien species (Source: http://iufro-archive.boku.ac.at/iufro/silvavoc/glossary/29_0en.html)</p>
	<p>Forest conversion "Restoration by planting, sowing and / or resulting from human actions to propagate seeds of natural origin"; "Native (original) vegetation"; "Reforestation by planting, sowing and / or promoting human natural regeneration by spreading seeds of natural origin"; native (original) vegetation";</p>	<p><u>Rejected</u> The proposal does not apply to this definition</p>
	<p>Reforestation "Regeneration by planting and / or intentional sowing or natural regeneration"; "Regeneration by artificial planting and / or sowing as well as natural regeneration";</p>	<p><u>Accepted partly</u> See definition above</p>
	<p>Sensitive natural resource features. "Sensitive natural resource features" "Vulnerable natural resource features"</p>	<p><u>Accepted</u> Vulnerable natural resource features</p>
	<p>Genetically modified trees) Note 2 1) macro-injection, micro-encapsulating - macro-injection, and micro-encapsulation</p>	<p><u>Accepted</u> To state the part of term in the following wording: Note 2 1) macro-injection, and micro-encapsulation</p>
	<p>Genetically modified trees Note 2 polyploidy - polyploidy</p>	<p><u>Accepted</u> To state the part of term in the following wording: Note 2 polyploidy</p>
	<p>Trees outside forest (TOF) - Trees outside forest</p>	<p><u>Accepted</u> To state the name of term in the following wording: Trees outside Forests (TOF)</p>
<p>4.1 The general requirements for sustainable forest management defined in this standard d) require the recording that provides evidence of compliance with the requirements of the forest management standards;</p>	<p>Point d). It is necessary to explain what kind of recording it is. Accounting, primary, electronic, etc. The explanation is required.</p>	<p><u>Accepted partly</u> within the subtleties of translation The wording is proposed: d) require record-keeping that provides evidence of compliance with the requirements of the forest management standards;</p>
	<p>Items e - g should be excluded because they refer to PEFC certification. The forest can be managed in sustainable manner and not be certified at all or be certified under another certification scheme.</p>	<p><u>Rejected</u> This standard is referred to PEFC certification</p>

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4.1.1	Difficult to understand	<p><u>Taken note</u> Shall be edited within the subtleties of the translation in the final version.</p>
<p>4.3 Determining the scope of the management system 4.3.2 The forest management shall comprise the cycle of inventory and planning, implementation, monitoring and evaluation, and shall include an appropriate assessment of the social, environmental and economic impacts of forest management practices. This shall form a basis for a cycle of continuous improvement.</p>	<p>4.3.2 It is stated one-sidedly because sustainable forest management includes the process of governance itself and forest management itself (in English there is no independent term). Include forest management components in the definition of the forest management process and add a definition of monitoring, given that this context implies the monitoring of forest management quality and compliance with the legislation in accordance with the parameters set out in Annex B. To word this item as follows: "The forest governance process shall include cyclical measures for forest inventory and forest activity planning, forest management, monitoring of forest management quality and compliance with the legislation in accordance with the parameters set out in Annex B, and appropriate analysis of data, as well as appropriate social, environmental and economic assessment. impact of forestry activities. This shall form a basis for a cycle of continuous improvement of forest governance system".</p>	<p><u>Accepted partly</u> The definition of the term "forest management" is in glossary This is sub-indicator from the base standard, changes to which could be minimal and in exceptional cases.</p>
5 Leadership	<p>Any forestry enterprise must comply with current legislation aimed at sustainable forest management, so it is inappropriate to oblige the enterprise to make a statement in this regard and post it on the website, and the responsibility for sustainable forest management is defined by law and job descriptions. Either delete the entire section or restate it as follows and move it instead of 6.3.1: "6.3.1. Compliance with legislation 3.1 The organization shall comply with applicable laws and requirements of this standard and work to improve the system of sustainable forest management.b) to continuously improve the sustainable forest management system. 6.3.2 The requirements of applicable law and this standard shall be made freely available to all interested parties.</p>	<p><u>Rejected</u> The standard section shall not be deleted.</p>

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	6.3.3 The responsibilities for sustainable forest management shall be clearly identified and assigned to specific persons in their job descriptions".	
<p>6.2 Management plan</p> <p>6.2.1 The management plans shall be:</p> <p>a) elaborated and periodically updated or continually adjusted;</p> <p>b) corresponded to the size of forest area and its type of use;</p> <p>c) based on applicable local, national or international legislation as well as on existing land-use plans or other official plans;</p> <p>d) adequately covering all kinds of forest resources.</p>	<p>Item 6.2.1.c) Ukraine is the unitary state and has no local legislation. International law can be applied only in case that Ukraine has acceded / ratified a document. And in this case, changes are made to national legislation.</p> <p>The item should be worded as follows: "be based on applicable local, national and international legislation, as well as on existing land use plans or other official plans, taking into account regional specifics and international trends and requirements;"</p>	<p><u>Accepted partly</u></p> <p>The term "current law" is replaced by "applicable law" throughout the text of the standard</p> <p>Item c) is stated in the wording:</p> <p>c) based on applicable legislation as well as existing land-use or other official plans;</p>
	<p>Items 6.2.1. b) and d) non-clear wording, clarification is needed. What does it mean to correspond to "the size of the territory" or "to cover all types of resources". Clarification is needed.</p>	<p><u>Taken note</u></p> <p>Item b) is stated in the wording:</p> <p>b) appropriate to the category and use of the forest area;</p>
<p>6.2.6 The management plans shall take into account the results of scientific research.</p>	<p>What kind of research? "Shall" - is a mandatory form. How should the enterprise fulfill such requirement?</p>	<p><u>Rejected</u></p> <p>The basic standard version uses a mandatory form. The wording is proposed:</p> <p>6.2.6 The management plans shall take into account the results of scientific research.</p>

Structural element of the standard	Comment, proposal	Developer's conclusion
<p>6.3 Compliance requirements</p> <p>6.3.1 Legal compliance</p> <p>6.3.1.1 The organisation shall identify applicable legislation on forest use, provide access to it, as well as establish what obligations to comply with the law may be applied to it.</p> <p>6.3.1.2 The organisation shall comply with applicable legislation on management, including but not limited to forest management practices; nature and environmental protection; protected and endangered species; property, tenure and land-use rights for local communities or other affected stakeholders; health, labour and safety issues; anti-corruption and the payment of applicable royalties and taxes.</p> <p>6.3.1.3 If anti-corruption legislation is absent, the Organization shall develop measures to reduce the risk of corruption.</p>	<p>Item 6.3.1. The requirement of the item is contrary to national law, as it is binding throughout the country and does not depend on local requirements. In addition, Ukraine has anti-corruption legislation</p> <p>Proposal: Put the item in the wording as above</p> <p>"6.3.1. Compliance with legislation</p> <p>6.3.1 The organization shall comply with applicable laws and requirements of this standard and work to improve the system of sustainable forest management.</p> <p>6.3.2 The requirements of applicable law and this standard shall be made freely available to all interested parties.</p> <p>6.3.3 The responsibilities for sustainable forest management shall be clearly identified and assigned to specific persons in their job descriptions".</p>	<p><u>Accepted partly</u></p> <p>This is sub-indicator from the base standard, changes to which could be minimal and in exceptional cases.</p> <p>The wording is proposed:</p> <p>6.3.1 Legal compliance</p> <p>6.3.1.1 The organisation shall identify and have access to the legislation applicable to its activity.</p> <p>6.3.1.2 The organisation shall comply with current legislation on management, including but not limited to forest management practices; nature and environmental protection; protected and endangered species; property, tenure and land-use rights for local communities or other affected stakeholders; health, labour and safety issues; anti-corruption and the payment of applicable royalties and taxes.</p> <p>6.3.1.3 The organisation shall develop measures to reduce the corruption risk in accordance with anti-corruption legislation.</p> <p>6.3.1.4 The measures shall be implemented to address protection of the forest from unauthorised activities such as illegal logging, illegal land use, illegally initiated fires, and other illegal activities. (Added according to the base version).</p>
<p>6.3.4.1.1 The organization shall provide the appropriate occupational health and safety management system for all employees engaged by the Organization to perform the work, including service providers (contractors)</p>	<p>The organization shall provide the appropriate occupational health and safety management system for all employees engaged by the Organization to perform the work, including service providers (contractors)</p> <p>This is contrary to current legislation. The enterprise cannot provide OSH MS for contractors. The contractors have their own OSH MS. The enterprise can only control through the contract the compliance with the labour protection requirements by Contractors.</p>	<p><u>Rejected</u></p> <p>The occupational safety and health management system should include various measures, including control. Termination of agreements with contractors, in case they violate the requirements of labour protection is also one of the management tools.</p>
<p>6.3.4.3.2 Wages for both local workers and migrants, contractors and other workers involved in PEFC-certified areas shall meet at least the statutory</p>	<p>Item 6.3.4.3.2. Wage requirements shall apply to all enterprises, not just PEFS certified ones. To delete words "Involved in PEFC-certified areas".</p>	<p><u>Rejected</u></p> <p>This standard is referred to PEFC certification</p>

Structural element of the standard	Comment, proposal	Developer's conclusion
branch minimum standards or exceed them (if any) under collective agreements		
7.2 Competence 7.2.1.4 The organization shall bring the employees' competence under control.	How to control the competence of staff? What is the mechanism for fulfilling this requirement?	<u>Rejected</u> The organization controls the competence of staff through the appraisal of employees.
7.3.2. The approved procedures of the Organization for interaction with stakeholders shall reflect: a) issues involving stakeholders;	Does the Organization decide to what to involve the stakeholders and to what not?	<u>Rejected</u> Communication with the stakeholders is two-way, but the Organization in its management activities shall take the initiative to consult with the stakeholders to prevent negative consequences in future. The Organization cannot prohibit the stakeholders to show their own initiative.
8. Operation	General comments This section should be entitled "Criteria and indicators for sustainable forest management" and contains the country's vision of how to assess the sustainability of forest management and how it is determined. In this version, pan-European criteria are taken, but do they need to be copied, rather than developing our own criteria? The development of standard is an ideal opportunity to work out our own criteria and indicators.	<u>Rejected</u> The title and essence of the section corresponds to the basic version of the standard.
Criterion 1 <u>Maintenance or appropriate enhancement of forest resources and their contribution to the global carbon cycle</u>	The name of Criterion 1. Not the accuracy of the translation from English, in addition, the phrase should make sense in Ukrainian. should be worded as follows: "Maintenance and appropriate enhancement of forest resources and their contribution to global carbon cycles." Maintenance and appropriate enhancement of forest resources and their contribution to global carbon cycles https://foresteurope.org/sfm-criteria-indicators2/#1472654622790-134bceef-8021a184-c9ce5d80-64e0 .	<u>Accepted partly</u> Stated in the wording: <u>8.1 Criterion 1: Maintenance or appropriate enhancement of forest resources and their contribution to the global carbon cycle</u>
8.1.1 Management of organisation shall aim to maintain or increase forests and their ecosystem services as well as the economic, ecological, cultural and social values of forest resources.	Item 8.1.1. It is not spelled and stylistically correct. should be worded as follows: 8.1.1 Forest management shall be aimed at maintenance the existing forest cover and enhancement of forest area and the volume of ecosystem services provided by forests, as well as their economic, environmental,	<u>Accepted partly</u> (The use of the phrase "Management of Organization" has been repeatedly discussed and agreed at the working group meeting, so it's reasonable to adhere to this terminology and leave it unchanged (the terms "management" and

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	<p>cultural and social values.</p> <p>Item 8.1.1. The list of relevant indicators is not complete (e.g. for areas covered / uncovered with forests, established forest management restrictions, etc.). There are no indicators regarding ecosystem services that are part of forest management. If no indicators are added, this part should be removed from the item name. We need to add additional indicators or edit the name.</p>	<p>"organization" are in the standard and defined in the Glossary of the standard).</p> <p>Accepted version: 8.1.1 Management of organisation shall aim to maintain and increase forests and their ecosystem services as well as the economic, ecological, cultural and social values of forest resources.</p> <p>Regarding the rest of indicator 8.1.1, the comment is partly accepted and supplemented with new indicator 8.1.1.4, which concerns forest ecosystem services.</p> <p>It was decided not to add more indicators on ecosystem services and economic, environmental, cultural and social values of forest resources in order to avoid duplication, as they are largely covered in the indicators of criteria 8.5-8.6.</p> <p>Also, the existing sub-indicators 8.1.1 partially affect the issues of ecosystem services, for example, according to the Forest Code of Ukraine (Article 79) timely "... reforestation is carried out to 2) improve water protection, soil conservation, sanitation and other useful properties of forests" (in the standard is taken into account by the requirement of sub-indicator 8.1.1.1).</p> <p>8.1.1.3 regulates the issues of forest categories (according to the FCU), which shall provide forest ecosystem services, in particular category 2 (provides recreational services), category 3 (water protection, soil conservation).</p> <p>8.1.1.4. Forest ecosystem services within the territory of the Organization and on adjacent territories shall be identified and measures to maintain and improve such services shall be implemented.</p>
<p>8.1.1.1 Timely reforestation according to the types of forest habitats shall be provided on logged area after clear cuttings.</p>	<p>What if the reforestation process will be significantly stretched over time within the areas left for natural regeneration?</p>	<p><u>Rejected</u></p> <p>According to the existing practice, the logged areas are left for the natural regeneration in case of sufficient viable undergrowth, which will be able to ensure timely renewal of the logged area and subsequent transfer to a forested area. Therefore, there should be no obstacles in the way of this</p>

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		<p>indicator. 8.1.1.1. Timely reforestation according to the types of forest habitats shall be provided on logged area after clear cuttings.</p>
<p>8.1.2. The quantity and quality of the forest resources and the capacity of the forest to store and sequester carbon shall be safeguarded in the medium and long term by ensuring the timber logging in quantities not exceeding the total average changes in stock during the revision period (except in cases of emergencies related to natural disasters), using appropriate silvicultural measures and preferring techniques that minimise adverse impacts on forest resources.</p>	<p>Item 8.1.2. There is no negative impact on forest resources, there is a negative impact on the forest, woodland, etc. Replace "that minimise adverse impacts on forest resources" with "that minimise adverse impacts on forest".</p>	<p><u>Rejected</u> The term "forest resources" is retained, which corresponds to the original (from the PEFC base standard) indicator. Adverse impacts on forest resources can lead to decrease the number or deterioration of the quality of these forest resources (both timber and non-timber), such as reduced stock or commercial quality of timber, reduced concentration of berry patches, quality of hunting areas, etc. (As well we can also analyze the SFRAoU Regulations?) 8.1.2. The quantity and quality of the forest resources and the capacity of the forest to store and sequester carbon shall be safeguarded in the medium and long term by ensuring the timber logging in quantities not exceeding the total average changes in stock during the <u>revision period</u> (except in cases of emergencies related to natural disasters), using appropriate silvicultural measures and preferring techniques that minimise <u>adverse impacts on forest resources</u>.</p>

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<p>8.1.2.1. The volume of logged timber shall not exceed the total average change in stock during the revision period, except the cases when the increase of logging is due to the occurrence of emergencies related to natural disasters (including loss of viability of trees under the influence of natural or anthropogenic factors)</p>	<p>1. The version is satisfactory Trees damaged by wind, snow (windfalls, windbreaks, snowbreaks), fire, as well as suddenly thinned as a result of management activities (high-intensity thinning, cutting of forests under power lines, fire breaks, as well as in forest stands adjacent to the logged areas after clear cuttings) are very attractive for stem pests. Outbreaks can be identified with natural disasters if the area of forests of a certain tree species, which was affected by these factors, exceeds 20% of forest area of this species. Source of 20% Criterion: Ustskiy I.M. Methodical instructions to collect information for the database of forest subcompartments in Ukraine, in which pathological processes are observed. Kharkiv, 2009. 14 p.</p> <p>2. Why only natural disasters are mentioned? There are other factors.</p>	<p>Comment 1 is <u>taken note</u>. Comment 2 is <u>rejected</u> This version of sub-indicator was accepted at the WG meeting and agreed between all participants. Also supported by the additionally invited expert Other factors, such as damage by forest pests and diseases, are decided not to prescribe as exceptions to the possible excess, in order to prevent potential abuse. 8.1.2.1. The volume of logged timber shall not exceed the total average change in stock during the revision period, except the cases when the increase of logging is due to the occurrence of emergencies related to natural disasters.</p>
<p>8.1.2.3 Preference shall be given to selective and shelterwood systems of final felling.</p>	<p>Item 8.1.2.3. It is necessary to add "where possible", as it is not always possible to use selective and shelterwood systems. It is necessary to add "where possible".</p>	<p><u>Rejected</u> The wording was previously subject to discussion and accepted by consensus. Revised version: 8.1.2.3. Preference shall be given to selective and shelterwood systems of final felling.</p>
<p>8.1.3.3. Burning of logging residues of coniferous tree species can be carried out only if their abandonment leads to deterioration of the sanitary and fire protection condition of forests. Burning of logging residues of deciduous tree species can be carried out only in cases where their abandonment can lead to the spread of specific pest species, if there is a proper scientific justification.</p>	<p>In the regions with sufficiently humid climate, it is reasonable to leave logging residues scattered over logged area or in the form of small banks to promote conditions for their destruction by invertebrates, fungi and other organisms. This will increase the number of such organisms, which has decreased significantly in managed forests, and will allow them to decompose organic matter better and faster, in particular the logging residues in future. In regions with insufficient moisture, the most appropriate way to clean the logging area is to grind the logging residues and scatter them on the area in the form of mulch. With relation to safety and reduction of negative environmental impact it is expedient to carry out all loggings (except the following exception), mainly in the winter period (more precisely - in the frosty period, but it is unrealistic taking into account climate</p>	<p><u>Taken note</u> The sub-indicator was left in the basic version, which was approved at the meeting by representatives of various sections, including the environmental one. That is, there are exceptions for which the fire method of logged area cleaning is possible. 8.1.3.3. Burning of logging residues of coniferous tree species can be carried out only if their abandonment leads to deterioration of the sanitary and fire protection condition of forests. Burning of logging residues of deciduous tree species can be carried out only in cases where their abandonment can lead to the spread of specific pest species, if there is a proper justification.</p>

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	<p>change) because the adjacent trees are necessarily injured during cutting, and pathogens that are not dangerous in the frosty period get into them and develop. The exception is sanitary cutting in bark beetle breeding grounds, which should be carried out immediately after the settlement of trees and before the departure of the new generation, regardless of the season, mainly from April till September.</p> <p>I consider the burning of logging residues is inexpedient in all cases.</p>	
<p>8.1.5 Afforestation of ecologically important non-forest ecosystems shall not occur unless in justified circumstances where the conversion:</p>	<p>Terminologically incorrect: "sensitive, rare or endangered non-forest ecosystems"; Russism "ecologically significant non-forest ecosystem".</p> <p>It is proposed to replace with "vulnerable, rare or endangered non-forest ecosystems"; "ecologically important non-forest ecosystem".</p>	<p><u>Accepted partly</u>, namely in 8.1.5 c) applied "...vulnerable, rare or endangered non-forest ecosystems..." (Also, this corresponds to the English literal translation in the original text "vulnerable", although already in 8.4.1 "sensitive" ecosystems are also used in English "sensitive" - to agree?).</p> <p>in 8.1.5 d) applied "... ecologically important non-forest ecosystem..."</p> <p>8.1.5. Afforestation of ecologically important non-forest ecosystems shall not occur unless where such conversion: ...</p> <p><i>and further on the text of the basic definition including changes in the text.</i></p>
<p>8.1.6 "f) safeguards socio-economic functions of forests and ecosystem services of forests".</p>	<p>Missing letter "f) safeguards socio-economic functions of forests and ecosystem services of forests".</p> <p>Fix on "f) safeguards socio-economic functions of forests and ecosystem services of forests".</p>	<p><u>Accepted</u></p> <p>f) safeguards socio-economic functions of forests and ecosystem services of forests;</p>
<p>8.2 <u>Criterion 2: Maintenance of forest ecosystem health and vitality</u></p>	<p>Item 8.2. There are no indicators to prevent damage to forests due to biotic and abiotic factors. Additional indicators need to be added (including cattle grazing).</p>	<p><u>Accepted partly</u> in indicator 8.2.1 (see added sub-indicators).</p> <p>Also regarding the impact of cattle grazing is particular in 8.4.12.</p>
<p>8.2.1.1. Forest management shall be aimed at the formation in future of uneven-aged mixed multi-layered stands.</p>	<p>How to ensure this in A₀-A₂, where nothing grows except pine, or in D₃-D₄, where the engineer of forest planting will be angry for pine planting - if I get right the word "mixed" (coniferous-deciduous), or it means "non pure planted forests", again one not that: Polishchuk means one thing, I mean another</p>	<p><u>Accepted</u></p> <p>This indicator is the important factor to ensure the viability of forest ecosystems, as uneven-aged mixed multi-layered stands are usually much more environmentally stable.</p> <p>8.2.1.1. Forest management <u>in favorable forest conditions</u> shall be aimed at the formation of</p>

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8.2.1.2 Secondary stands (secondary forest ecosystems) shall be gradually replaced by native stands (native forest ecosystems).	This requirement may not be possible due to climate change.	uneven-aged mixed multi-layered stands. <u>Accepted</u> Stated in the wording: 8.2.1.2 Secondary stands (secondary forest ecosystems) shall be gradually replaced by native stands (native forest ecosystems), <u>taking into account changes in natural and climatic conditions.</u>
8.2.1.3 Areas of degraded forests shall be restored to their natural state that existed before the degradation.	It may be unknown what the state was before the degradation, if the arable land was transferred to forestry enterprise, but on which there were fields for 40 years	<u>Rejected</u> The requirement of the indicator clearly applies to forest areas where factors caused the degradation are known. This example refers to a conversion / change of intended land use that has taken place over a long period of time and where the forest environment has been significantly disturbed during this time.
		New sub-indicator is added 8.2.1.4. Measures shall be taken to prevent and control improper hunting, fishing, collecting as well as other kinds of special using of forest resources.
		New sub-indicator is added 8.2.1.5. It's necessary to control cattle grazing and haymaking on legally agreed forest sites to prevent their damage.
8.2.2.1 Measures to conserve the diversity of forest ecosystems shall be undertaken during the implementation of forestry activities. In particular, the seed trees of main forest species, valuable and rare trees and shrubs shall be left on cutting areas during logging. Some elements of forest ecosystems important for biodiversity conservation (including single dead standing and fallen trees, defective and oldest trees, etc.) shall be left intact, if their abandonment does not lead to deterioration of forest health and justified in terms of labor protection.	It is necessary to specify how many seed trees of what species and what diameter (usually the worst trees in condition and the smallest trees in diameter are left). If you leave three single pines on the logged area of 3 hectares, it is likely that they will soon be inhabited by bark beetles, die and fall on young planted forest. Leaving old dried trees and long-fallen trees will not worsen the sanitary condition of forests, as the insects and fungi that inhabit them are not dangerous to viable trees. Trees that have recently been windfallen and have live phloem can be inhabited by pests first of all, and if they are still in contact with the soil, they can be the breeding place for pests for a long time. The oldest and defective trees can be inhabited by trunk pests with the same probability as other trees of the same species, because the attractiveness for	<u>Taken note</u> Previously, the Working Group decided not to enter the quantitative parameters for tree abandonment, as the individual approach should be applied to each forest site, based on the existing conditions. Stated in the wording: 8.2.2.1. Measures to conserve the diversity of forest ecosystems shall be undertaken during the implementation of forestry activities. In particular, the seed trees of main forest species, valuable and rare trees and shrubs shall be left on cutting areas during logging. Some elements of forest ecosystems important for biodiversity conservation (including single dead standing and fallen trees, defective and oldest trees, etc.) shall be left intact, if their abandonment does not lead to deterioration of forest health and justified in terms of labor protection.

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	<p>trunk pests is determined by the condition of the phloem and the composition of protective substances.</p> <p>From the view point of danger, in the managed forests it's reasonable to remove or cut off some of the dried branches, which can injure forestry workers and recreants or damage vehicles. In the protected forests such trees should be removed only near specially designated trails, and in other places the passage of people should be prohibited and the appropriate signs should be put up.</p>	
<p>8.2.2.2 Damage to the soil cover on the cutting site in the presence of viable undergrowth shall not exceed 15% of cutting site.</p>	<p>How to fulfill this requirement? If the area is occupied by the undergrowth, it is so good... How does this correlate with the next sub-indicator 8.2.2.3?</p>	<p><u>Rejected</u> It does not contradict the requirements of national legislation, in particular the "The Rules of Final Timber Harvest", Section IV. "Requirements for Logging Technologies".</p>
<p>8.2.4 Appropriate forest management practices such as reforestation and afforestation with tree species and provenances ...</p>	<p>The explanation is needed for provenances (forms and varieties of tree species). Proposal: "8.2.4 Appropriate forest management practices such as reforestation and afforestation with tree species and provenances (forms and varieties)..."</p>	<p><u>Accepted</u> 8.2.4. Appropriate forest management practices such as reforestation and afforestation with tree species and provenances (forms, varieties) that are suited to the site conditions or the use of tending, harvesting and transport techniques that minimise tree and/or soil damages shall be applied according to local natural conditions.</p>
<p>8.2.4.1 Preference shall be given to natural reforestation.</p>	<p>Word "given" should be replaced. Preference shall be devoted to natural reforestation.</p>	<p><u>Rejected</u> According to modern Ukrainian spelling, the expression "Preference is given" is used. 8.2.4.1 Preference shall be given to natural reforestation.</p>
<p>8.2.4.3 When introduced species are used for reforestation, the documented professional assessment of their potential negative impact in order to avoid undesirable environmental consequences shall be carried out.</p>	<p>It is proposed to expand the sub-indicator 8.2.4.3. When introduced species are used for reforestation, the documented professional assessment of their potential negative impact and possibilities of its mitigation by system of measures (monitoring of condition and development, prevention of spontaneous spread by special control measures (mechanical, chemical), restrictions on using of introduced species for artificial regeneration, etc.) in order to avoid undesirable environmental consequences shall be carried out.</p> <p>What do we mean by "undesirable environmental</p>	<p><u>Accepted</u> The phrase "undesirable environmental consequences" has been clarified and replaced with "... invasive effects". Stated in the wording: 8.2.4.3. When introduced species are used for reforestation, the documented professional assessment of their potential negative impact and possibilities of its <u>mitigation</u> by system of measures (monitoring of condition and development, prevention of spontaneous spread by special mechanical and / or chemical control measures,</p>

Structural element of the standard	Comment, proposal	Developer's conclusion
	consequences"? This definition needs to be detailed	restrictions on using of introduced species for artificial regeneration, etc.) in order to avoid <u>invasive effects</u> shall be carried out.
8.2.6 Integrated pest management, appropriate silviculture alternatives and other biological measures shall be preferred to minimise the use of pesticides.	Unfortunately, the use of pesticides cannot be avoided during the growing of forest planting stock; the pesticides must be constantly changed, as pathogens adapt faster than new pesticides are registered. Protection of young planted forests from damage to cockchafer larvae isn't also possible without insecticides, and they must be applied at least twice per season and insecticides must be constantly changed. Similarly, it's very difficult to obtain good harvest of seeds, including nuts, acorns, etc. on seed plantations without 2-3 insecticide treatment. As a result of dubious savings, seeds are harvested where they can be obtained, i.e. not of the best quality. As the area of plantations of fast-growing species increases, there will also be the urgent need to protect them with pesticides. The wording is correct, but in comparison with the agriculture, pesticides are not practically used in forestry, as their registration is more expensive than the utilization capacity.	<u>Taken note</u> 8.2.6. Integrated pest management, appropriate silviculture alternatives and other biological measures shall be preferred to minimise the use of pesticides.
8.2.6.2 The pesticide application <u>strategy</u> shall be developed in the Organization.	What is meant by "pesticide application strategy"?	<u>Rejected</u> The strategy here means the rationale, approaches and set of measures, including occupational safety, using of pesticides, which are implemented in case of ineffectiveness or impossibility of integrated pests and diseases management or silviculture alternatives (<i>could be added to the Glossary</i>).
<u>Criterion 3. Maintenance and encouragement of productive capacity of forests (wood and non-wood)</u>	The name of Criterion 3 does not correspond to the original, which is not about the productive capacity, but about productive function. should be worded as follows: "Criterion 3: Maintenance and encouragement of productive function of forests (wood and non-wood)."	<u>Accepted частично</u> <u>8.3 Criterion 3: Maintenance and encouragement of productive functions of forests (wood and non-wood)</u> Original text: «Maintenance and encouragement of productive functions of forests (wood and non-wood)»
8.3.4. Harvesting levels of both wood and non-wood forest products shall not exceed a rate that can be sustained in the long term, and optimum use shall be made of the harvested products.	Item 8.3.4. Yes, the products should not be destroyed in log yards, but in the absence of demand for logged timber, such indicator will make impossible to obtain the certificate. Delete "and	<u>Rejected</u> The indicator actually aims to prevent the logging of timber "in stock" and its further deterioration. The purpose of the indicator is the logging of timber

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	optimum use shall be made of the harvested products."	provided with the corresponding demand. It is also the requirement to use the "original" PEFC standard indicator. 8.3.4. Harvesting levels of both wood and non-wood forest products shall not exceed a rate that can be sustained in the long term, and optimum use shall be made of the harvested products.
8.3.4.1. The volume of logged timber shall not exceed the total average change in stock during the revision period, except the cases when the increase of logging is caused by the occurrence of emergencies related to natural disasters	See response for 8.1.2.1	<p><u>Accepted</u> The indicator is replaced by: 8.3.4.1. The data of total average change in stock and actual logged timber volumes shall be systematically analyzed and reported in order to compare them to ensure the long-term sustainable level.</p>
	Regarding the logged stock. The maximum logged stock is specified twice in 8.1.2 and in 8.3.4.1. Make adjustments to avoid duplication.	
	This sub-indicator is the repeat of 8.2.2.1 Why only natural disasters are mentioned? There are other factors.	
		<p>New sub-indicator is added: 8.3.4.2 Basic forest inventory and management planning shall be carried out at least once every ten years.</p>
		<p>New sub-indicator is added: 8.3.4.3. Volumes of commercially harvested non-timber products shall not exceed the approved in accordance with the established procedure limits on the special use of forest resources during the harvesting of minor forest products.</p>
8.3.5.1 During constructing roads, skid tracks, bridges etc. all requirements for erosion prevention and environmental impact minimization shall be met.	Is this requirement concerned to interim log yards or timber loading sites this ? To expand the requirement.	<p><u>Accepted</u> 8.3.5.1. During constructing roads, skid tracks, bridges, <u>timber loading sites, and other infrastructure</u>, all requirements for erosion prevention and environmental impact minimization shall be met.</p>
<u>Criterion 4 Maintenance, conservation and appropriate enhancement of biological diversity in forest ecosystems</u>	The name of Criterion 4. It is hardly possible to enhance biodiversity. A more accurate translation is "enhancement". should be worded as follows: "Criterion 4. Maintenance, conservation and appropriate enhancement of biological diversity in	<p><u>Accepted partly.</u> The following version of Criterion 4 translation has been accepted: <u>8.4 Criterion 4: Maintenance, conservation and appropriate enhancement of biological diversity</u></p>

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8.4.2 Inventory, mapping and planning of forest resources shall identify, protect, conserve or set aside ecologically important forest areas; specific measures shall be planned for protection and / or conservation of these areas.	forest ecosystems. It turns out that taxators should do everything ... And what about the involvement of other scientific, environmental organizations ??	<u>in forest ecosystems</u> <u>Taken note.</u> First, the PEFC standard ST 1003: 2018 clearly states "inventory, mapping and planning of forest resources", which clearly indicates to inventory, mapping and planning works. Second, the involvement of other scientific and environmental organizations, which is referred to in the proposal, is provided in the text of indicator - "... and other work on design and planning."
8.4.3.3 Protected zones of the habitats of protected plant and animal species, threatened species and endangered species shall be marked on the cartographic materials of the Organization.	Sub-indicator 8.4.3.3 requires the organization to carry out work that is not within its competence. Delete sub-indicator.	<u>Rejected</u> On the one hand, the author of the proposal is right and these works are not within the competence of the Organization. But on the other hand, the requirement of sub-indicator 8.4.3.3 logically follows from the requirements of sub-indicator 8.4.3.2. Mapping of protected zones simplifies situation analysis, for example, during building new infrastructure. The following version of the sub-indicator was accepted: 8.4.3.3 Protected zones of the habitats of protected plant and animal species, threatened species and endangered species shall be marked on the cartographic materials of the Organization.
8.4.3.6 The Organization shall take measures to prevent illegal hunting, as well as the trapping and collection of protected species, threatened species and endangered species.	What should the Organisation do in cases where hunting areas are transferred to other users? How the Organisation can enforce this requirement.	<u>Taken note.</u> The following version of the sub-indicator is proposed: 8.4.3.6 The Organization shall take measures to prevent illegal hunting, as well as the trapping and collection of protected species, threatened species and endangered species. In cases where hunting areas are transferred to other users, the Forest Guard of the Organization usually conducts joint raids with the hunting service of hunting area users.
8.4.4 The successful regeneration shall be ensured through natural regeneration or planting that is adequate to ensure the quantity and quality of the forest resources.	Reforestation issues are duplicated in 8.2.4 and 8.4.4. Make adjustments to avoid duplication.	<u>Rejected</u> Indicators 8.2.4 and 8.4.4 are not identical. In particular, 8.4.4 concerns purely reforestation.
8.4.5 Native species that are well-adapted to site	The thesis "Limited use of introduced species to	<u>Taken note.</u>

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<p>conditions shall be preferred for reforestation and afforestation. Only those introduced species, provenances or varieties shall be used whose impacts on the ecosystem and on the genetic integrity of native species and local provenances have been scientifically evaluated, and if negative impacts can be avoided or minimised. Limited use of introduced species to assess their impact is possible only under the guidance and control of research institutions.</p>	<p>assess their impact is possible only under the guidance and control of research institutions" does not provide any alternative to the Organisation and, moreover, provides for constant financial costs for their services.</p>	<p>The methodological recommendations and guidelines have been developed and approved in Ukraine; they relate, in particular, to the use conditions of introduced tree species. These documents can (and should) be used by forestry Organisations.</p>
<p>8.4.5.1 Species selected for reforestation and afforestation shall comply with forest site conditions and be predominantly aboriginal species of local origin.</p>	<p>Technical error "species shall comply with forest site conditions". Fixed version "species shall comply with forest site conditions".</p>	<p><u>Accepted</u> The following version is proposed: 8.4.5.1 Species selected for reforestation and afforestation shall comply with forest site conditions and be predominantly aboriginal species of local origin.</p>
<p>8.4.5.2 Introduced species shall not be cultivated in the forest except where severe forest site conditions (including generated by climate changes) don't allow to apply aboriginal species.</p>	<p>Sub-indicator 8.4.5.2 requires the editorial change. should be worded as follows: 8.4.5.2 Introduced species shall not be planted in the Organisation's forests except where severe forest site conditions (including generated by climate changes) don't allow to apply aboriginal species.</p>	<p><u>Rejected</u> Indicator 8.4.5 requires the limited use of introduced tree species in reforestation and afforestation. They can be used under certain conditions and with certain restrictions, but it is desirable that the area with the domination of introduced species at least does not increase, and ideally - decreases.</p>
<p>8.4.5.3 Introduced species shall only be used if there is conclusive documented evidence (practical experience and / or research results) of the verifiability of such species. Limited use of introduced species to assess their impact is possible only under the guidance and control of research institutions.</p>	<p>Item 8.4.5.3. This sub-indicator should be about new introduced species, as currently a certain number of introduced species which are used in Ukraine don't need documentary evidence of their using appropriateness. Add the word "new" before "Introduced species"</p>	<p><u>Rejected</u> Even currently used in Ukraine introduced species behave unpredictably, which is primarily due to climate change, and these species could be highly invasive in potential.</p>
	<p>The standard sub-indicator devoted to the use of introduced species could be supplemented with the Annex with the list of promising introduced species proposed by the Tree Breeding Laboratory of UkrFRI. (Recommendations for establishment of forest seed base of the most promising introduced forest trees/compilers: Los S.A., Orlovska T.V., Grygorieva V.G. / - Kharkiv, 2008. - 34 pp.). Place in the appendix "The List of Species Promising for Certain Introductory Areas by Designed Purpose"</p> <p>*. * The appendix is provided in separate file.</p>	<p><u>Rejected</u> It is not advisable to be limited to one recommendation</p>

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	<p>Aren't the terms for introduced species using too hard?</p> <p>The requirement forces the Organisation to incur additional costs for "guidance and control of research institutions" even if it has its own specialists or its own research department.</p> <p>So any use of introduced species would be a violation?</p>	<p><u>Taken note.</u></p> <p>The following version of the sub-indicator is proposed:</p> <p>8.4.5.3 Introduced species shall only be used if there is conclusive documented evidence (practical experience and / or research results) of the verifiability of such species.</p> <p>Limited use of introduced species to assess their impact is possible only under the guidance and control of research institutions.</p>
<p>8.4.5.4 The Organization shall develop and implement effective measures to monitor and control the expansion of invasive introduced species detected within the Organization's area.</p>	<p>The note after sub-indicator 8.4.5.4. is desirable.</p> <p>Note: The general list of non-aboriginal (adventive) species of vascular plants of Ukraine includes species that are in the expansion state and / or have high invasive capacity [Protopopova V.V., Mosyakin S.L., Shevera M.V. Influence of adventive plant species on the phytobiota in Ukraine. Assessment and directions to reduce threats to biodiversity in Ukraine. Responsible editor O.V.Dudkin. Kyiv: Khimdzest. 2003. P. 129-155, 366-372.]. Among tree and shrub species in the expansion stage are: Acer negundo L. and Amorpha fruticosa L. Acer negundo L., Ailanthus altissima (Mill.) Swingle, Amorpha fruticosa L., Bupleurum fruticosum L., Elaeagnus angustifolia L., Padus serotina (Ehrh.) Ag. have high invasive ability. Such species need to be priority monitored over the rate of their expansion and the developmental character.</p>	<p><u>Rejected</u></p> <p>It is not reasonable to be limited to the current list, which can be expanded.</p>
<p>8.4.6 The afforestation, reforestation and other tree planting activities that contribute to the improvement and restoration of ecological connectivity shall be promoted.</p>	<p>Indicator 8.4.6 The name of the indicator refers to reforestation and afforestation, while the sub-indicator refers only to afforestation. We need to add additional indicators or edit the name.</p>	<p><u>Accepted</u></p> <p>Sub-indicator 8.4.6.1 has been supplemented</p>
<p>8.4.6.1 The organization shall identify forest areas suitable for reforestation, where forest cover has been lost due to abiogenic and biogenic factors and due to anthropogenic activities as well as non-forest areas, the afforestation of which will improve or restore ecological connectivity.</p>	<p>8.4.6.1 The organization shall identify forest areas suitable for reforestation, where forest cover has been lost due to abiogenic and biogenic factors and due to anthropogenic activities as well as non-forest areas, the afforestation of which will improve or restore ecological connectivity.</p> <p>8.4.6.1 The organization shall identify forest areas suitable for reforestation, where forest cover has</p>	<p><u>Accepted</u></p> <p>The following version of the sub-indicator is proposed:</p> <p>8.4.6.1 The organization shall identify forest areas suitable for reforestation, where forest cover has been lost due to abiogenic and biogenic factors and due to anthropogenic activities as well as non-forest areas, the afforestation of which will improve or</p>

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	been lost due to abiogenic and biogenic factors and due to anthropogenic activities as well as non-forest areas, the afforestation of which will improve or restore ecological connectivity.	restore ecological connectivity.
8.4.8 The diversity of both horizontal and vertical structures and the diversity of species such as mixed stands shall be promoted, where appropriate. The practices shall also aim to maintain or restore landscape diversity.	There is duplication of the content in the component indicators 8.4.8, 8.2.1, 8.1.2.3. Make adjustments to avoid duplication.	<u>Rejected</u> 8.4.8 and 8.2.1 are indicators that we can change only within the "subtleties of translation". The following version of the indicator is proposed: 8.4.8 The diversity of both horizontal and vertical structures and the diversity of species such as mixed stands shall be promoted, where appropriate. The practices shall also aim to maintain or restore landscape diversity.
8.4.10.1 Thinning and sanitary cuttings shall be conducted in a way that does not cause soil erosion, damage to remaining trees, and exclude the possibility of negative impact on the condition of forests and water bodies.	Why does this requirement apply only to thinning and sanitary cuttings? Proposal: This requirement must apply to any cutting.	<u>Accepted</u> The following version of the sub-indicator is proposed: 8.4.10.1 Any logging shall be conducted in a way that does not cause soil erosion, damage to remaining trees, and exclude the possibility of negative impact on the condition of forests and water bodies.
8.4.10.4 Erosion control measures (arrangement of fascines and wicker fences, earth embankments, drains, leveling of depressions on skid tracks), clearing of watercourses from logging residues, repairing of the damaged access roads shall be carried out.	On what logging areas???? Why aren't words said about clear cutting? Because on clear cutting areas it is necessary to leave buffer zones along elements of water erosion (ravines) at least 10 m.	<u>Taken note</u> We are waiting for suggestions (in the form of sub-indicator) and the reference to the relevant item of the current "The Rules of Final Timber Harvest"
8.4.11 Infrastructure shall be planned and constructed in a way that minimises damage to ecosystems, especially to rare, sensitive or representative ecosystems and genetic reserves, and that takes threatened or other key species – in particular their migration patterns – into consideration. 8.4.11.4 The Organization shall assess and document the potential extent of damage to ecosystems, especially to rare or vulnerable ecosystems and genetic reserves, habitats of endangered species or other key species before commencing design work for the construction of the infrastructural facility. If there is the risk of significant	Incorrect in the view point of terminology: "Sensitive ecosystems". "Vulnerable ecosystems" is proposed	<u>Accepted частково</u> The following version of the indicator is proposed: 8.4.11 Infrastructure shall be planned and constructed in a way that minimises damage to ecosystems, especially to rare, sensitive or representative ecosystems and genetic reserves, and that takes threatened or other key species – in particular their migration patterns – into consideration. The following version of the sub-indicator is proposed: 8.4.11.4 The Organization shall assess and document the potential extent of damage to ecosystems, especially to rare or vulnerable

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<p>damage - the location of infrastructural facility shall be changed.</p>		<p>ecosystems and genetic reserves, habitats of endangered species or other key species before commencing design work for the construction of the infrastructural facility. If there is the risk of significant damage - the location of infrastructural facility shall be changed.</p>
<p>8.4.12.1 The organization shall initiate the regulation measures or regulate the number of animal populations that adversely affect on reforestation successfulness, stand growth and biodiversity to the scientifically based level.</p>	<p>Item 8.4.12.1. There is a conflict, because the Organisation has no rights to regulate the number of animal populations, and extraction quotas are approved by the executive authorities. Should be worded as follows: "The organization shall initiate the obtaining of necessary permits and promote regulation measures for animal populations that adversely affect on reforestation successfulness, stand growth and biodiversity to the scientifically based level".</p> <p>How should the organization prove it? "Should" it be a motivating form?</p>	<p><u>Accepted</u> The following version of the sub-indicator is proposed: 8.4.12.1 The organization shall initiate the obtaining of necessary permits and promote regulation measures or regulate the number of animal populations that adversely affect on reforestation successfulness, stand growth and biodiversity to the scientifically based level.</p>
<p>8.4.12 With due regard to management objectives, measures shall be taken to control the pressure of animal populations on forest regeneration and growth as well as on biodiversity.</p>	<p>8.4.12 With due regard to management objectives, measures shall be taken to control the pressure of animal populations on forest regeneration and growth as well as on biodiversity. With due regard to management objectives, measures shall be taken to control the pressure of animal populations on forest regeneration and growth as well as on biodiversity.</p> <p>There is no criterion for the territories and objects of Nature Reserve Fund (protected areas). It may be necessary to add it by limiting the area of such areas for one Organisation. Add a new indicator.</p>	<p><u>Accepted</u> The following version of the indicator is proposed: 8.4.12 With due regard to management objectives, measures shall be taken to control the pressure of animal populations on forest regeneration and growth as well as on biodiversity.</p> <p><u>Rejected</u> The territories and objects of Nature Reserve Fund (protected areas) in this standard are the integral part of ecologically important forest areas, to which indicator 8.4.2 is devoted.</p>
<p>8.4.13.1 To ensure the preservation of biological diversity during clear cuttings, the following elements of forest ecosystem (or their parts) shall be left standing, unless their removal is justified by labour protection, safety reasons or negative implications for adjacent forest sites:</p> <ul style="list-style-type: none"> • separate clumps of trees with the presence of viable undergrowth, rare plant species, bird's nests and other biodiversity elements; 	<p>Technical or stylistic error "trees of endemic and rare tree species". "Endemic and rare tree species" is proposed.</p>	<p><u>Accepted</u> The following version of the sub-indicator is proposed: 8.4.13.1 To ensure the preservation of biological diversity during clear cuttings, the following elements of forest ecosystem (or their parts) shall be left standing, unless their removal is justified by labour protection, safety reasons, passages of vehicles or negative implications for adjacent forest sites:</p>

Structural element of the standard	Comment, proposal	Developer's conclusion
<ul style="list-style-type: none"> • very old and hollow trees; • standing deadwood, windthrown trees and snags; • trees of endemic and rare tree species. 		<ul style="list-style-type: none"> • separate clumps of trees with the presence of viable undergrowth, rare plant species, bird's nests and other biodiversity elements; • very old and hollow trees; • standing deadwood, windthrown trees and snags; • endemic and rare tree species.
<p><u>Criterion 5 Maintenance or appropriate enhancement of protective functions in forest management (notably soil and water)</u></p>	<p>The name of Criterion 5. Inaccuracy translation from English. Should be worded as follows: "Criterion 5: Maintenance or appropriate enhancement of protective functions in forest management (notably soil and water). C5: Maintenance, conservation and appropriate enhancement of protective functions in forest management (notably soil and water) https://foresteurope.org/sfm-criteria-indicators2/#1472655832486-b783d647-1a70a184-c9ce5d80-64e0.</p>	<p><u>Accepted</u> The following version of Criterion was accepted: <u>8.5 Criterion 5: Maintenance or appropriate enhancement of protective functions in forest management (notably soil and water)</u></p>
<p>8.5.1.2 The organization shall contribute to the maintenance or enhancement of carbon sequestration in forest ecosystems (primarily in trunk timber). The content of sub-indicator 8.5.1.2 is more relevant under criterion 1. Move the sub-indicator</p>	<p>The content of sub-indicator 8.5.1.2 is more relevant under criterion 1. Move the sub-indicator</p>	<p><u>Rejected</u> The sub-indicator refers to indicator 8.5.1, which relates in particular to carbon sequestration.</p>
<p>8.5.1.3 The total volume of timber removed during logging shall not exceed the average change in stock during the current revision period, except the cases when the increase of logging is caused by the occurrence of emergencies related to natural disasters. In this case, excessive timber harvesting shall be compensated in the next revision period.</p>	<p>Item 8.5.1.3. The information of this sub-indicator is already taken into account in 8.1.2., 8.1.2.1, 8.3.4.1. Delete sub-indicator</p>	<p><u>Accepted</u> Sub-indicator is deleted</p>
<p>8.5.3 The special care shall be given to forestry operations on sensitive soils and erosion-prone areas as well as in areas where operations might lead to excessive erosion of soil into watercourses. Techniques applied and the machinery used shall be suitable for such areas. Special measures shall be taken to minimise the pressure of animal populations on these areas.</p>	<p>Imperfect translation "The special care shall be given to forestry operations on sensitive soils and erosion-prone areas". Proposed: "The special care shall be given to forestry operations on erosion-prone areas and on erosion-hazardous areas"</p>	<p><u>Accepted partly</u> The following version of the indicator is proposed: 8.5.3 The special care shall be given to forestry operations on sensitive soils and erosion-prone areas as well as in areas where operations might lead to excessive erosion of soil into watercourses. Techniques applied and the machinery used shall be suitable for such areas. Special measures shall be taken to minimise the pressure of animal populations on these areas.</p>

Structural element of the standard	Comment, proposal	Developer's conclusion
8.5.4.2 Skidding tracks shall not be laid closer than 20 meters from permanent and 10 meters from temporary watercourses, in the sources of rivers and around them.	Compliance with this requirement is not realistic for forestry organisations within the Carpathian region.	<u>Taken note</u> The sub-indicator corresponds to item 33 of "The Rules of Final Timber Harvest in the Mountain Forests of the Carpathians"
8.5.5.1 The designing, construction and exploitation of forest roads, bridges and other infrastructure shall be carried out in a manner that minimises bare soil exposure, avoids the introduction of soil into watercourses and preserves the natural level and function of water courses and river beds. (see also 8.4.11)	Is it possible to mention timber loading sites (intermediate log yards) in the same way as in sub-indicator 8.3.5.1?	<u>Accepted</u> The following version of the sub-indicator is proposed: 8.5.5.1 The designing, construction and exploitation of forest roads, bridges, timber loading sites and other infrastructure shall be carried out in a manner that minimises bare soil exposure, avoids the introduction of soil into watercourses and preserves the natural level and function of water courses and river beds. (see also 8.4.11).
<u>Criterion 6 Maintenance or appropriate enhancement of socio-economic functions and conditions</u>	The name of Criterion 6. Inaccuracy translation from English. The original refers to "socio-economic functions and conditions" because the productive functions of forests are directly related to the economy. The criterion does not take into account the full range of indicators, in particular regarding the use of biofuels. Should be worded as follows: "Criterion 6: Maintenance of other socio-economic functions and conditions". C6: Maintenance of other socio-economic functions and conditions https://foresteurope.org/sfm-criteria-indicators2/#1472655832486-b783d647-1a70a184-c9ce5d80-64e0 .	<u>Rejected</u> In the English standard original: "Maintenance or appropriate enhancement of socio-economic functions and conditions" The following version of Criterion was accepted: <u>8.6 Criterion 6: Maintenance or appropriate enhancement of socio-economic functions and conditions</u>
8.6.2.2 The organization shall agree with the hunting areas users the places for construction of fenced area and other objects related to hunting management, in order to ensure free and safe access of the population to forests for recreational purposes.	Where is the access - into the fenced area? The sentence is not stated correctly Proposed wording: "The organization shall agree with the hunting areas users the places for construction of fenced area and other objects related to hunting management, in order to ensure free and safe access of the population to forests for recreational purposes outside the fenced areas".	<u>Rejected</u> Sub-indicator was discussed at previous meetings and adopted by consensus
8.6.5 The best use shall be made of forest-related experience and traditional knowledge, innovations and practices such as those of forest owners/users, NGOs, local communities. Equitable sharing of the	Пункт 8.6.5. Індикатор є прямим перекладом з англійської і не враховує української специфіки. Item 8.6.5. The indicator is a direct translation from English and does not take into account the specifics	<u>Rejected</u> We can change the wording of criteria and indicators only within the "subtleties of translation" Accepted version:

Structural element of the standard	Comment, proposal	Developer's conclusion
benefits arising from the utilization of such knowledge should be encouraged.	of Ukraine. Should be worded as follows: "8.6.5 Forest experience, traditional knowledge, innovation, investment and cooperation between forest owners, permanent forest users, relevant non-governmental organizations and local communities shall be most effectively applied".	8.6.5 The best use shall be made of forest-related experience and traditional knowledge, innovations and practices such as those of forest owners/users, NGOs, local communities. Equitable sharing of the benefits arising from the utilization of such knowledge shall be encouraged.
8.6.7.1 In order to obtain scientific data to ensure sustainable forest management, the Organization should cooperate with scientific institutions (for example, by concluding economic contracts for research or advisory services) and / or in various ways to support research within the Organization.	Is it now all Organisations will be required to enter into contracts with scientists?	<u>Taken note</u> No! The following version of the sub-indicator is proposed: 8.6.7.1 In order to obtain scientific data to ensure sustainable forest management, the Organization should cooperate with scientific institutions (for example, by concluding economic contracts for research or advisory services) and / or in various ways to support research within the Organization.
9.1. Monitoring, measurement, analysis and evaluation 9.1.1. The monitoring of forest resources and evaluation of their management, including ecological, social and economic effects, shall be periodically performed, and results fed back into the planning process.	Item 9.1.1. "Monitoring of forest resources" concept is absent in Ukraine. In addition, see the comments to section 4.3.2. should be worded as follows: "9.1.1. The inventory of forest and evaluation of their implemented management activities, including ecological, social and economic effects, shall be periodically performed, and results of this monitoring fed back into the further planning process".	<u>Rejected</u> The definition of the term "monitoring" is in the Glossary
9.1.3 Where it is the responsibility of the forest owner/manager and included in forest management, the use of non-wood forest products, including hunting and fishing, shall be regulated, monitored and controlled.	So forestry organisations don't have the right to control them... Especially to regulate. This is the interference in the activities of another entity.	<u>Rejected</u> This is the question of activity of the organisation - the applicant / holder of the certificate.
9.3 Management review 9.3.1 The 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 management system; c) information on the organisation's performance, including trends in: - nonconformities and corrective actions; - monitoring and measurement results; -	Item 9.3. The English version refers to the assessment of forest management quality. In addition, editing is needed to make it clear what this section is about. Should be worded as follows: "9.3 The assessment of management system 9.3.1 The annual management assessment shall at least include: a) the measures taken since the preliminary assessment; b) changes in external and internal issues that are	<u>Accepted partly</u> within the subtleties of translation Updated version: 9.3 Management review 9.3.1 The 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 management system; c) information on the organisation's performance,

Structural element of the standard	Comment, proposal	Developer's conclusion
<p>audit results; d) opportunities for continual improvement.</p> <p>9.3.2 The outputs of the management review shall include decisions related to continual improvement opportunities and any need for changes to the management system.</p> <p>9.3.3 The documented information as evidence of the results of management reviews shall be retained.</p>	<p>relevant to the management system;</p> <p>c) information on the organisation's performance, including trends in:</p> <ul style="list-style-type: none"> - nonconformities and corrective actions; - monitoring and inventory measurement results according to the indicators from Annex B; - audit results; <p>d) opportunities for continual improvement.</p> <p>9.3.2 The outputs of the management review shall include decisions related to continual improvement opportunities and any need for changes to the management system.</p> <p>9.3.3 The documented information as evidence of the results of management reviews shall be retained".</p> <p>Management review The standard requires that 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 management system; c) information on the organisation's performance, including trends in: • nonconformities and corrective actions; • monitoring and measurement results; • audit results; d) opportunities for continual improvement. 9.3.2 The standard requires that the outputs of the management review shall include decisions related to continual improvement opportunities and any need for changes to the management system. 9.3.3 The standard requires that documented information as evidence of the results of management reviews shall be retained.</p>	<p>including trends in:</p> <ul style="list-style-type: none"> - nonconformities and corrective actions; - monitoring and measurement results according to the indicators from Annex B; - audit results; <p>d) opportunities for continual improvement.</p> <p>9.3.2 The outputs of the management review shall include decisions related to continual improvement opportunities and any need for changes to the management system.</p> <p>9.3.3 The documented information as evidence of the results of management reviews shall be retained.</p>
<p>10. Improvement</p> <p>10.1 Nonconformity and corrective actions</p> <p>10.1.1 When a nonconformity occurs, the organisation shall:</p> <ul style="list-style-type: none"> a) react to the nonconformity and, as applicable: <ul style="list-style-type: none"> 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: 	<p>The section should be presented in a more understandable Ukrainian language. Editing is required.</p>	<p><u>Accepted partly</u> within the subtleties of translation</p> <p>Updated version:</p> <p>10. Improvement</p> <p>10.1.1 When a nonconformity occurs, the organisation shall:</p> <ul style="list-style-type: none"> a) react to the nonconformity and, as applicable: <ul style="list-style-type: none"> 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

Structural element of the standard	Comment, proposal	Developer's conclusion
<p>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 management system, if necessary. 10.1.2 The corrective actions shall be appropriate to the effects of the nonconformities encountered. 10.1.3 The 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.</p>		<p>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 management system, if necessary. 10.1.2 The corrective actions shall be appropriate to the effects of the nonconformities encountered. 10.1.3 The organisation shall retain documented information during two certification cycles as evidence of: a) the nature of the nonconformities and any subsequent actions taken; b) the results of any corrective action.</p>
<p>10.1.1. b) evaluate the need for action to eliminate the causes of the nonconformity, in order that it does not recur or occur elsewhere, by:</p>	<p>b) evaluate the need for some action to eliminate the causes of the nonconformity, in order that it does not recur or occur elsewhere, by: b) evaluate the need for any action to eliminate the causes of the nonconformity, in order that it does not recur or occur elsewhere, by:</p>	<p><u>Accepted</u> <u>Updated version:</u> b) evaluate the need for action to eliminate the causes of the nonconformity, in order that it does not recur or occur elsewhere, by:</p>
<p>10.1.3 The 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.</p>	<p>What is the document retention period?</p>	<p><u>Accepted</u> Updated version: 10.1.3 The organisation shall retain documented information during two certification cycles as evidence of: a) the nature of the nonconformities and any subsequent actions taken; b) the results of any corrective action.</p>
<p>Annex B.</p>	<p>The list is not exhaustive, and the standard does not provide guidance on how to interpret such information. For example, "Parameters of the forestry area by age structure, species composition, timber stocks and areas" If the average age increases is it good or bad? It is reasonable to add, among other things, such monitoring indicators as the level of wages, the volume of work on thinning and sanitary cutting, environmental education and</p>	<p><u>Rejected</u> Annex B of the Standard is recommendatory. The organisation shall independently determine the list of monitoring objects and the parameters of the received information interpretation, in accordance with the peculiarities of the organisation.</p>

Structural element of the standard	Comment, proposal	Developer's conclusion
	<p>provide parameters for the interpretation of the information obtained.</p> <p>"Alien (invasive) species" - incorrect interpretation: 1) "Alien" - popular-scientific term, 2) "alien species" - is not synonymous with "invasive species". Editing is required depending on the purpose of the monitoring program. It is proposed to distinguish non-native species, and among them invasive ones (in absolute units and in %). Non-native species or adventive species (alien species) are species that are distributed in places or regions outside their natural range and could become invasive or expansive, i.e. pose a threat to species, coenoses, ecosystems. This terminology includes both unconsciously and consciously introduced species that have been migrated or acclimatized by humans. (Source: Global Strategy on Invasive Alien Species// Convention of Biological Diversity, SBSTTA Sixth Meeting. – Monreal, 2001.– 52 p.)</p>	<p><u>Accepted</u> Proposed version: "Non-native species, including invasive species"</p>

The Head
of Working Group
on Standard Development Yu.M.Marchuk