

PEFC INTERNATIONAL STANDARD

PEFC ST 2003-1:202X

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Enquiry Draft

Additional Requirements for Certification Bodies Operating Certification against the PEFC EUDR DDS Module Standard



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Instructions for giving feedback in the public consultation

Launch of the consultation: 27 July 2026

To participate in the consultation, please add your comments directly in this Word document using tracked changes and/or comments and send the completed document to standards@pefc.org.

If you represent an organisation, please provide the name of the organisation in your email. We also ask that each organisation submits a single consolidated set of comments.

Deadline for comments: 25 August 2026

Following the consultation, the PEFC Chain of Custody Working Group will review the comments and prepare the final drafts of the documents.

If you have any questions, please do not hesitate to contact us at standards@pefc.org.

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The official version of the document is in English. Translations of the document can be obtained from the PEFC Council or PEFC National Governing Bodies. When there is doubt in regard to language interpretation, the English version is the reference.

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Foreword

PEFC, the Programme for the Endorsement of Forest Certification, is a worldwide organisation promoting sustainable forest management through forest certification and labelling of forest-based products. Products with a PEFC claim and/or label offer assurances that the raw materials used in their manufacture originate from sustainably managed forests and Trees outside Forests (TOF) areas, recycled and controlled sources.

The PEFC Council endorses national and regional forest certification systems that comply with PEFC Council requirements. Systems are subject to regular evaluations.

This document had been developed in an open, transparent, consultative and consensus based process covering a broad range of stakeholders, by a multi-stakeholder Working Group coordinated by the PEFC Council, Programme for the Endorsement of the Forest Certification (PEFC), and approved by the PEFC Board of Director on xx xxx 202x.

The requirements of the document become effective for all certification bodies operating certification against PEFC ST-MO 2002:1, *Requirements for the Implementation of PEFC EUDR Due Diligence System (PEFC EUDR DDS)* as of xx xxx 202X (with a transition period of xxx months from the date of entry into force).

The standard PEFC ST 2003-1:202X replaces the PEFC bridging document, version 2, *Additional guidance for certification bodies auditing against the PEFC EUDR DDS module standard ST 2002-1:2024*, published on 1st August 2025.

Table 1: Summary of the main changes between this standard and the PEFC bridging document.

Chapter	Main changes
Chapter 4 General requirements	Additional requirements require the certification body to: - provide information, related to its PEFC EUDR DDS certification and PEFC EUDR DDS activities of its client organisation, upon request to the defined parties - allow PEFC Council secretariat staff and/or PEFC authorised body staff to participate as observer during the audits - have legally enforceable certification agreements with clients consent to share information related to the client’s compliance to PEFC EUDR DDS certification and to the EUDR to defined parties, the range of information that may be shared, and those will be made publicly available - have procedures to conduct unannounced or short-notice audits
Chapter 5 Resources requirements	- an additional requirement requiring certification body ensure that active auditors maintain their competence regarding PEFC interpretations, certification body procedures, and best audit practices.

Chapter 6 Process requirements	
Section 6.1. Application	- additional requirements require that certification body needs to receive additional information from their client as part of the application, such as if the client's application for PEFC CoC or PEFC EUDR DDS certification was/is rejected by other certification body with reasons; and if the client's certification (PEFC or other certification system) was suspended, withdrawn or terminated with provided reasons.
Section 6.2. Application review	- additional requirements that certification body shall not accept the client's application if there is evidence of client's current engagement in corrupt practices or illegal sourcing. In case of historic engagement in corrupt practices or illegal sourcing, certification body shall not accept the application unless there is evidence that such engagement has stopped, or its legal predecessor/s, is not subject to any ongoing legal investigation and/or sanctions. Certification body is required to provide evidence to PEFC.
Section 6.3. Audit	Additional requirements cover: - audit to add PEFC EUDR DDS into the organisation's scope may happen as part of the regular cycle of PEFC CoC or as an additional audit - audit to assess the accuracy of data and means when the client sourcing non-certified material that was classified as negligible risk, and evaluation if a visit of forest is needed. - audit time of PEFC EUDR DDS certification - additional aspects that certification body need to consider while determining the audit time and sampling during the audit.
Chapter 6.4. Certification documentation	Additional requirements cover that certification body needs to: - provide a copy of the audit report, the summary of audit report, together with the certificate. - summary of the audit report and the certificate will be published on PEFC website. - summary of audit includes at least information specified in Appendix 3 and shall not include any confidential information
Section 6.6 Unannounced or short-notice audits	- additional requirements that certification body may conduct unannounced or short-notice audits, outside of the five years certification cycle

Chapter 7 Management system requirements	- additional requirement requires certification body, on request, needs to provide to PEFC the result of their annual internal audit, limited to the certification body's performance of PEFC chain of custody activities and of PEFC EUDR DDS certification activities
Appendices	- two new normative appendices are added, covering minimum content of summary of audit reports, and of audit reports, and temporary allowance of unaccredited audit against PEFC EUDR DDS module.

Introduction

The PEFC Council is the owner of the PEFC forest certification scheme. The PEFC Council has revised the PEFC EUDR DDS module standard to bring it in alignment with the EUDR 2025/2650, to support PEFC chain of custody certified organisations demonstrating their compliance with the EUDR regulation.

PEFC develops this standard to cover additional requirements for certification bodies providing certification services against the PEFC ST-MO 2002-1:202X, complementing PEFC ST 2003, *Requirements for Certification Bodies Operating Certification against the PEFC International Chain of Custody Standard*

1. Scope

This standard provides additional requirements to *PEFC ST 2003, Requirements for Certification Bodies Operating Certification against the PEFC International Chain of Custody Standard* for certification bodies that are providing audits that cover under the scope the PEFC ST-MO 2002-1:202X, PEFC EUDR DDS ST module. When auditing against the PEFC EUDR DDS ST module, certification bodies shall follow PEFC ST 2003 and the additional requirements of this standard.

To provide audits against the requirements laid out in PEFC ST-MO 2002-1:202X, certification body personnel shall be qualified to provide PEFC chain of custody audits as per PEFC ST 2003 and be qualified according to the additional requirements in this document.

Certification against PEFC EUDR DDS module standard is not a proof of legal compliance with EUDR. Legal responsibility solely relies with the certified organisation.

The term “shall” is used throughout this standard to indicate those provisions that are mandatory. The term “should” is used to indicate those provisions that, although not mandatory, are expected to be adopted and implemented. The term “may” used throughout this standard indicates permission expressed by this standard whereas “can” refers to the ability of a user of this standard or to a possibility open to the user. Further details can be found in the ISO/IEC Directives, Part 2.

2. Normative references

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

PEFC ST 2002, *Chain of Custody of Forest and Trees Based Products, Requirements* (available from www.pefc.org)

PEFC ST-MO 2002-1:202X, *Requirements for the Implementation of PEFC EUDR Due Diligence System (PEFC EUDR DDS)* (available from www.pefc.org)

PEFC ST 2003, *Requirements for Certification Bodies providing certification against the PEFC International Chain of Custody Standard* (available from www.pefc.org)

Regulation (EU) 2023/1115 of the European Parliament and of the Council of 31 May 2023 on the making available on the Union market and the export from the Union of certain commodities and products associated with deforestation and forest degradation and repealing Regulation (EU) No 995/2010 (from now onwards: EUDR)

Regulation (EU) 2025/2650 of the European Parliament and of the Council of 19 December 2025 amending Regulation (EU) 2023/1115 as regards certain obligations of operators and traders (from now onwards, EUDR 2025/2650).

Delegate act xx.

3. Terms and definitions

3.1 General

All terms and definitions from PEFC ST-MO 2002-1:202X are applicable.

4. General requirements

4.1 General

The criteria against which the client organisation's PEFC EUDR DDS is evaluated are those outlined in the latest version of the **PEFC EUDR DDS module**.

Note: The latest version of the **PEFC EUDR DDS module**, their amendments and corresponding transition periods, are available from the PEFC website www.pefc.org.

- 4.1.1** The **certification body** shall provide, on request, any information to the European Commission, the **competent authorities**, PEFC Council and PEFC authorised body, related to its PEFC EUDR DDS certification activities, and PEFC EUDR DDS activities of its client organisations. Falling or unwillingness to fulfil this obligation, shall lead to the exclusion of the **certification body** from participating in and conducting certification services against the **PEFC EUDR DDS module**.
- 4.1.2** The **certification body** shall allow PEFC Council secretariat staff and/or PEFC authorised body staff to participate as observers during audits as part of the PEFC EUDR DDS monitoring system, with prior agreement and coordination with the client organisation and the PEFC notified certification body.

4.2 Certification agreement

- 4.2.1** The **certification body** shall ensure that the legally enforceable agreement for the provision of certification activities to its clients includes the client consent to the **certification body** sharing information related to the client's PEFC EUDR DDS certification with European Commission, competent authorities, PEFC Council and PEFC authorized body, related to the client organisation's compliance with the PEFC EUDR DDS module, and generally, with the client organisation's compliance with EUDR, the range of information that may be shared, and that this information will be made publicly available on the PEFC database, such as the publicly available summary audit report.
- 4.2.2** The **certification body** shall ensure that this legally enforceable agreement includes information on the **certification body** procedures to conduct unannounced or short-notice audits and acceptance of the client organizations for such audits.

5. Resource requirements

5.1 Certification body personnel

5.1.1 Auditors

5.1.1.1 PEFC EUDR DDS training

The **certification body** shall ensure that auditors have successfully passed an initial training on the **PEFC EUDR DDS module standard**, that is recognised by the PEFC Council, before starting auditing against the standard.

Note: The PEFC website www.pefc.org provides further information on training options.

5.1.1.2 Competencies

5.1.1.2.1. The **certification body** shall ensure that auditors demonstrate ability to apply terminology, knowledge, understanding and skills in the areas mentioned under requirement 6.1.1.2.6.2 of the PEFC chain of custody for **PEFC EUDR DDS module standard**, specifically:

- a) the objectives and core processes of the PEFC system including the requirements from the PEFC Sustainable Forest Management standard (PEFC ST 1003) covered in the PEFC chain of custody definition of controversial sources, (PEFC ST 2002, clause 3.6 paragraphs b, c, d and e) and the definition of **non-compliant products** (PEFC ST-MO 2002-1, definition 3.x)
- b) principles and requirements of the **PEFC EUDR DDS module standard (PEFC ST-MO 2002-1)**
- c) application of the measures to avoid procurement of raw material from **non-compliant products**, including the relevant risk assessment methodology and indicators and risk mitigation measures.

5.1.2 Reviewer and certification decision makers

5.1.2.1 PEFC EUDR DDS training

5.1.2.1.1 The **certification body** shall ensure that the reviewer and certification decision maker have successfully passed an initial training on the **PEFC EUDR DDS module standard**, that is recognised by the PEFC Council.

Note: The PEFC website www.pefc.org provides further information on training options.

5.1.2.2 Competencies

5.1.2.2.1 The **certification body** shall ensure that the reviewer and certification decision maker demonstrate ability to apply knowledge and skills in the areas mentioned under requirement 6.1.1.4.6.1 of the PEFC chain of custody, for **PEFC EUDR DDS module standard**, specifically:

- a) the definition of **non-compliant products** (PEFC ST-MO 2002-1, clause 3.23)

5.2 Management of competence for personnel involved in the certification process

5.2.1. The **certification body** shall ensure that qualified reviewers, certification decision makers and auditors, every two calendar years, have successfully passed a refresher training in PEFC EUDR DDS module standard, that is recognised by the PEFC Council.

5.2.2 When there is a new issuance of the **PEFC EUDR DDS module standard**, the **certification body** shall ensure that qualified reviewers, certification decision makers and auditors have successfully passed a refresher training recognised by the PEFC Council that covers the new version of the standard, before starting operating against them.

Note: The PEFC website www.pefc.org provides further information on training options.

5.2.3 The **certification body** shall ensure that active auditors maintain their competence regarding PEFC interpretations, certification body procedures, and best audit practices.

6. Process requirements

6.1 Application

6.1.1 The **certification body** shall obtain from the client organisation, as a minimum, the following information and documentation as a part of the application for certification:

- a) documented procedures of the client organisation as defined in the **PEFC EUDR DDS module standard**
- b) descriptive identification of the products covered by the **PEFC EUDR DDS module standard** sufficient to identify product groups for which the **PEFC EUDR DDS module standard** is applied.
- c) sites covered by the **PEFC EUDR DDS module standard** in the case of multi-site certification
- d) in cases where the client organisation applies, or has applied, for PEFC Chain of Custody certification or **PEFC EUDR DDS module** certification with another **certification body** or bodies and the application was or is rejected, information on the reasons for the application rejection.
- e) If the client organisation participated in PEFC, or another certification system, prior to this application and the certification was suspended, withdrawn, or terminated, information on the reasons why the certification was suspended, withdrawn, or terminated.

6.1.2 The certification body shall obtain from the client organisation, as a minimum, for products covered by the **PEFC EUDR DDS module**, the following information relating to the application of the applicable requirements of the **PEFC EUDR DDS module**, for each site and/or product group as applicable:

- a) chain of custody method
- b) intended application of the PEFC trademarks

6.2 Application review

6.2.1 The **certification body** shall not accept applications where there is evidence of current engagement in corrupt practices or illegal sourcing of forest and tree-based materials by the client organisation. If evidence of such practices is found, the **certification body** shall provide the information to the PEFC Council and the PEFC authorised body. Evidence could include ongoing public investigations.

6.2.2 In the case of historic engagement in corrupt practices or illegal sourcing of forest and tree-based materials, the **certification body** shall not accept the application unless there is evidence that the engagement has stopped and that the client organisation, or its legal predecessor/s, is not subject to any ongoing legal investigation and/or sanctions. The information shall be provided to the PEFC Council and the PEFC authorised body.

6.3 Audit

6.3.1 The **certification body** shall conduct its evaluation using a risk-based approach, according to the scope, scale, intensity, and risk of the client organisations's operation.

6.3.2 The initial audit to cover the **PEFC EUDR DDS module** may happen as part of the regular cycle (initial audit, four surveillance audits and recertification audit) of the PEFC Chain of custody audit or as an additional audit.

6.3.3 The purpose of the audit is to:

- a) Determine the conformity of the client organisation's:
 - i. chain of custody process with the requirements of the **PEFC EUDR DDS module standard**, and their effective implementation
 - ii. management system with the requirements of the **PEFC EUDR DDS module standard**, and their effective implementation
 - iii. chain of custody process with requirements for the avoidance of procuring raw material from controversial sources **and/or non-compliant products** where applicable (PEFC DDS and **PEFC EUDR DDS module standard** requirements) and its effective implementation

Note 1: The usage of the PEFC trademarks and PEFC claims, **including the PEFC-EUDR claim**, is to be evaluated at the time of the surveillance and recertification audits. At audits that also cover the **PEFC EUDR DDS module**, any proposed or intended use of the PEFC trademarks and PEFC claims, **including the PEFC-EUDR claim**, is to be evaluated.

- b) Collect data as required by PEFC.

Note 2: Appendix 4 provides minimum information to be provided by the **certification body**.

6.3.4 The certification body shall conduct the audit following the relevant guidance provided in ISO 19011:2018, clause 6.4. In general, audits (initial, surveillance and recertification) shall be conducted on-site, except in those cases where requirements 7.4.6 or 7.9.2 of PEFC ST 2003 apply, where certification bodies may decide to conduct remote audits. When an audit to extend the scope of the organisation's chain of custody certificate to cover the PEFC EUDR DDS module happens outside of initial, surveillance or recertification audits, the certification body may use remote audit techniques to conduct such audit, provided it can demonstrate the credibility of doing such an audit remotely, and requirement 7.4.6 of PEFC ST 2003 applies.

6.3.5 For client organisations sourcing non-PEFC certified relevant products that the client organisation has classified as negligible risk, the certification body shall assess the accuracy of the data and the means used to obtain and evaluate such information by the client organisation. The certification body shall evaluate whether a visit of the forest is needed to assess the accuracy and justify the reason in the audit report, and when needed, include a visit to the forest, potential suppliers and sub-suppliers.

6.3.6 When the certification body conducts the audit against the PEFC EUDR DDS module standard at the same time as the PEFC Chain of custody audit, the certification body shall increase the audit time according to the scope, scale, intensity, and risk of the PEFC EUDR DDS certification scope, and the accuracy of the data that the client provided as part of the application.

- 6.3.7** When the certification body conducts the audit against the PEFC EUDR DDS module standard separately than the PEFC Chain of custody audit, the minimum audit time is of 4 hours.
- 6.3.8** This minimum audit times shall not include reporting activities, unless under specific conditions where it can be justified and documented.
- 6.3.9** In addition to the requirements of PEFC ST 2003, when determining the audit time and sampling during the audit, the certification body shall also consider the following aspects:
- a) client organisation's operations within the scope of the PEFC EUDR DDS module standard
 - b) substantiated concerns, EUDR substantiated concerns or complaints received by the client organisation or by the certification body that would point to the risk of nonconformity
 - c) history of non-conformities
 - d) translation needs, and
 - e) certification activities:
 - i. geographic scope
 - ii. type of audits
 - iii. the complexity and length of the supply chain that could create a significant risk of procuring material from controversial sources and/or **non-compliant products** and risk of mixing with controversial sources and/or with non-compliant products
 - iv. number of sites for which **PEFC EUDR DDS module standard** is applied

6.4 Certification documentation

- 6.4.1** The certification document shall include at least information on the date of granting, extending or renewing certification and the expiry date or recertification due date (see 7.7.6 of PEFC ST 2003). The effective date on a certification document shall not be before the date of the certification decision.
- 6.4.2** The **certification body** may reissue the organisation chain of custody certificate when adding the **PEFC EUDR DDS module standard** to the client's chain of custody certificate's scope.
- 6.4.3** If the certificate is reissued, the new valid date of the PEFC Chain of Custody standard and **PEFC EUDR DDS module standard** shall be the same. The re-issued certificate may maintain the certification cycle and maintain the same expiry date as the previous certificate.
- 6.4.4** The **certification body** shall indicate in the certification documentation the reason for the reissuance, e.g., 'Scope extension added for **PEFC EUDR DDS module standard**'.
- 6.4.5** In the case the certificate is not reissued, the certification documentation shall indicate clearly the date from which the scope of the PEFC Chain of custody is extended to include the **PEFC EUDR DDS module standard**.
- 6.4.6** The expiry date of the organisation chain of custody certificate shall remain the same.

6.4.7 The organisation's chain of custody certificate cycle shall remain the same.

Note: An example certificate with PEFC EUDR DDS module included in the organisation's certificate scope, with some anecdotal explanation, can be found in Appendix 5 of this document

6.4.8 In addition to the requirement of PEFC ST 2003, the scope of certification shall include the following information:

- a) reference to the PEFC ST 2002-1:2024, Requirements for the Implementation of PEFC EUDR Due Diligence System (PEFC EUDR DDS)
- b) products covered by the PEFC EUDR DDS module according to the PEFC product categories. In addition:
 - i. the **certification body** shall indicate the differentiation if the products covered under the PEFC EUDR DDS module standard differ from those covered only by PEFC Chain of Custody standard.
 - ii. the **certification body** shall ensure that all the products covered under the PEFC EUDR DDS module standard are covered under PEFC Chain of Custody standard.
 - iii. For the products covered under the PEFC EUDR DDS module standard, the **certification body** shall indicate in writing on the certification documentation that the product lists covered by the PEFC EUDR DDS module standard as mentioned in the certification documentation are verified as conforming to the PEFC EUDR DDS module. The **certification body** shall indicate in writing on the certification documentation that it does not verify those products as compliant against the EUDR.

6.4.9 The summary audit report shall include at least the information specified in Appendix 3.

6.4.10 The summary audit report shall not include any confidential information.

6.4.11 The **certification body** shall provide a copy of the audit report, and the summary audit report, together with the certificate, to PEFC Council and PEFC authorised body. On request, the certification documentation shall be provided in English. Any other necessary audit records may need to be provided, under request, in English, to PEFC, in accordance with requirement 4.5 of PEFC ST 2003:2020.

Note: The summary audit report will be publicly available from the PEFC website.

6.5 Termination, reduction, suspension or withdrawal of certification

6.5.1 The certification body shall follow up and investigate any **substantiated concerns** and/or **EUDR substantiated concerns** or complaints against a client organisation, and suspend the certificate as needed. The certification body shall keep PEFC informed about such case.

6.5.2 If certification is terminated, suspended or withdrawn, the certification body shall inform the client organisation that any further use of PEFC trademarks and claims is not allowed. In case of suspension, the certification body shall monitor whether the client is in compliance. The validity of PEFC EUDR DDS module scope shall be subject to the validity of the organisation's chain of custody certificate.

6.6 Unannounced or short-notice audits

- 6.6.1** The certification body shall conduct at least one surveillance audit within the five years certification cycle as an unannounced or short-notice audits.
- 6.6.2** Initial certification audit and recertification audits shall not be performed unannounced.
- 6.6.3** The organization, once certified, can voluntarily choose to conduct all audits (surveillance and recertification) as unannounced audits.
- 6.6.4** In addition, unannounced or short-notice audits may take place when the **certification body** has received a **substantiated concern and/or EUDR substantiated concern** or has received a complaint that the **client** is knowingly breaching a requirement in the standard.
- 6.6.5** The **certification body** shall have documented procedures covering unannounced audits. The procedures shall define the conditions under which it carries out unannounced or short-notice audits.
- 6.6.6** The conditions shall include the investigation of **substantiated concerns and/or EUDR substantiated concerns**, complaints, or higher risks of non-compliance.
- 6.6.7** The certification shall determine the date of the unannounced audit as part of the audit program.
- 6.6.8** Initial certification audit and recertification audits shall not be performed unannounced.
- 6.6.9** The organisation shall not be notified in advance of the date of the unannounced audit and the audit plan shall not be shared until the opening meeting.
- 6.6.10** The certification and the organisation may agree on blackout days in advance.
- 6.6.11** In exceptional circumstances, such as where security or safety restrictions apply or visa is required, the announced audit can happen in a time window of typically 30 days.
- 6.6.12** Blackout days may be agreed in advance between the CB and the certified organization.
- 6.6.13** The **certification body** may suspend or withdraw a **certificate** if the **client** does not accept an unannounced or short-notice audit without justified circumstances.
- 6.6.14** The **certification body** shall prepare an additional unannounced or short-audit report. Findings shall be treated as findings during regular audits.

7. Management system requirements

7.1 Internal audits of the certification body

On request, the **certification body** shall provide to the PEFC Council and the **PEFC authorised body** of the country where they operate (where applicable) the results of the annual internal audit of the **certification body**, limited to the performance of PEFC chain of custody certification activities and of the PEFC EUDR DDS certification activities.

Appendix 1 (normative): Accreditations accepted by the PEFC Council for PEFC notification

The scope of the accreditation shall explicitly cover PEFC ST 2002, Chain of Custody of Forest and Tree Based Products – Requirements and PEFC ST 2001, PEFC Trademarks Rules – Requirements and **PEFC ST-MO 2002-1:202X, Requirements for the Implementation of PEFC EUDR Due Diligence System (PEFC EUDR DDS module)** in its valid version as presented at the PEFC website www.pefc.org.

Appendix 2 (normative): Multi-site chain of custody certification

1. Eligibility criteria for the certification body

- 1.1** If the individual sites are applying different chain of custody methods, the application of the Chain of Custody standard shall be clearly stated in the certificate and any appendix for the individual sites. In addition, the certification documentation shall make it clear what chain of custody methods and which product groups and which scopes (PEFC ST 2002, and/or PEFC 2002-1) are available at each individual site (especially for producer groups).

Appendix 3 (normative): Minimum content of summary audit reports and audit reports

In addition to the requirements in PEFC ST 2003 Appendix 4, **certification bodies** shall include in the audit reports and summary audit reports the following elements:

1. Minimum content of the summary audit report

1.1 Front page

1.2 Description of client organisation

1.3 Description of client organisation's chain of custody management system by which the organisation maintains control of all product groups in the scope of the PEFC EUDR DDS module, product groups covered

1.4 Scope of the audit

- a) date of audit
- b) audit method (risk assessment and sampling basis, stakeholder consultation)
- c) audit duration (split by duration spent on-site and remotely – where relevant)
- d) audit itinerary including visit the forest & potential suppliers or sub-suppliers with justify reason.
- e) PEFC standards audited/certified (including version number)
- f) sites audited
- g) audit method (risk assessment and sampling basis, stakeholder consultation)
- h) certification of other **voluntary schemes** or standards

1.5 Audit findings including:

- a) place and date of issuance
- b) Aggregated list of **nonconformities** identified,

1.6 Other information

- a) date of audit
- b) place of issuance
- c) stamp and/or signature of issuing party

2. Minimum content of the audit report

2.1 Description of client organisation's chain of custody management system by which the organisation maintains control of all product groups in the scope of the PEFC EUDR DDS module, including input/output and aggregated country/ies or potential country/countries of origin of the relevant products. Estimated amount of PEFC certified material, PEFC controlled material, and PEFC-EUDR claim material in volume per each of those, purchase annually, and sold annually.

2.2 Audit findings including:

- a) place and date of issuance
- b) list of **nonconformities** identified, per each requirement including requirement number and for all, together with a respective action plan of corrective actions and timing for their correction. For minor nonconformities, estimated timing.
- c) Aggregated list of **substantiated concern & EUDR substantiated concern and complaints**

2.2. Scope of the audit

- a) applied certification criteria from **PEFC ST-MO 2002:1-202X** including for each product group and/or site as applicable
- b) audit duration covered **PEFC ST-MO 2002-1:202X** (split by duration spent on-site and remotely – where relevant)
- c) audit itinerary including visit the forest & potential suppliers or sub-suppliers with justify reason.

2.3 Audit findings including

- a) list of all the requirements and a justification of how they are met.
- b) **nonconformities** identified, per each requirement including requirement number and for all, together with a respective action plan of corrective actions and timing for their correction. For minor nonconformities, estimated timing.
- c) aggregated list of substantiated concern & EUDR substantiated concern and complaints

Appendix 4 (Informative): Example of certificate with PEFC ST 2002-1 in the organisation's chain of custody certificate scope



PEFC promotional logo granted to the Certification Body

Certification body logo

Accreditation mark of Accreditation Body – against ISO 17065]

Certificate of Compliance

This is to certify that **[Company name]** [Company address]

Has been independently audited and certified as meeting the requirements of the following standards, in its valid version as presented at the PEFC website www.pefc.org:

- PEFC ST 2002:2020, Chain of Custody of Forest and Tree Based Products – Requirements, dated 14/02/2020
- PEFC ST 2001:2020, PEFC Trademarks Rules – Requirements, dated 14/02/2020
- PEFC ST 2002-1:202X, Requirements for the Implementation of PEFC EUDR Due Diligence System (PEFC EUDR DDS), dated xx/xx/202X **#1**

Scope of certification: Production and trade of particleboard for furniture and veneered panels for flooring

CoC method(s): physical separation and percentage method

Products:

PEFC ST 2002:2020 CoC Product(s) **#2**

- **050500 Particleboard**
- **050200 Plywood**

PEFC ST 2002-1:202X EUDR DDS Product(s) **#3** NOTE: For the products covered under PEFC EUDR DDS module standard, the certification body shall indicate in writing on the certification documentation that the product lists covered by PEFC EUDR DDS module as mentioned in the certification documentation are verified as conforming to PEFC EUDR DDS module. The certification body shall indicate in writing on the certification documentation that it does not verify those products as compliant against the EUDR legislation.

- **050500 Particleboard**

Certificate number: AAAAA-PEFC-COC-123456

Certificate type: Individual **#4**

Note: The validity of this certificate shall be verified through the PEFC Find Certified: www.pefc.org/find-certified.

Issued by:

[Certification body name]

[Certification body address]

PEFC CoC Issue Date: 30 September 2025	PEFC EUDR Issue Date: 24 April 202X #5
PEFC CoC Expiry date: 29 September 2030	PEFC EUDR Expiry date: 29 September 2030

Signed on behalf of [Certification body name]

[Name & Position]

[Signature]

Seal of Certification Body

Notes for example certificate

All certification documentation shall follow requirements of PEFC ST 2003:2020 and any relevant guidance issued in PEFC GD 2001. A separate guidance document may be developed in the future for the PEFC ST 2002-1:202X standard.

#1 The PEFC ST 2002-1:202X shall be inserted into the list of standards where the scope extension has been issued by a CAB accredited to issue such an extension.

#2 #3 Where the certified organisation separates out its products to PEFC ST 2002:2020 and PEFC ST 2002-1:202X then the two separate scopes shall be listed separately. If the certified organisation takes it whole product scope into both standard scopes then this shall be clear on the certificates, e.g. “The following products are available under both PEFC ST 2002:2020 and PEFC ST 2002-1:202X”.

Any product covered under the PEFC ST 2002-1:202X shall also be covered under the PEFC ST 2002:2020. However, not all the products covered under the PEFC ST 2002:2020 may be covered by the PEFC ST 2002-1:202X.

A note shall be included to make it clear that this is not indicating conformity against the EUDR legislation.

#4 The certificate type shall be clear. This example shows an individual certificate. For Multisite and producer groups the certification documentation shall make it clear what COC control methods and which product groups and which scopes are available at each participating site (especially for producer groups).

#5 The commencement of the date of scope extension to PEFC ST 2002-1:202X shall be clear. This shall either be by the method shown on the example, or if the certification body follows a process of reissuing certificates with a new “valid from” date, the reason for the issue shall be clearly explained, e.g., “Scope extension added for PEFC ST 2002-1:202X”.

The expiry date of the certificate shall not change, and the PEFC ST 2002-1:202X scope validity shall depend on a Certified organisation holding a valid PEFC ST 2002:2020 scope.

Appendix 5 (Normative): Temporary allowance of unaccredited certification against the PEFC EUDR DDS Module

1. General

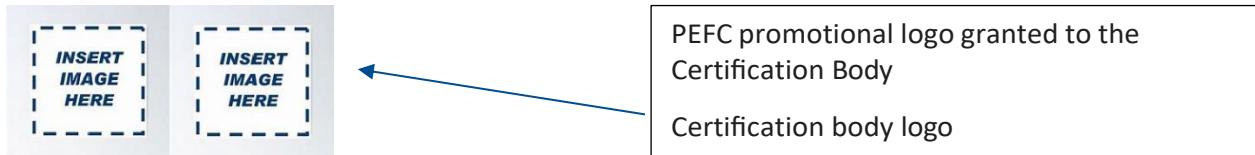
- 1.1** Whilst PEFC awaits approval of the Global Accreditation Cooperation Incorporated Multi Recognition Agreement (Global ACI MRA) process for accreditation of **certification bodies** for the revised **PEFC EUDR DDS module standard, PEFC ST-MO 2002-1** and revised requirements for Certification Bodies providing certification against the PEFC EUDR DDS module, **PEFC ST 2003-1**, the PEFC Council authorises **certification bodies** to carry out unaccredited audits and issue unaccredited certificates within the transitional period.
- 1.2** **Certification bodies** may provide unaccredited certification against the **PEFC EUDR DDS module standard** according to the following requirements on this standard (which shall override any requirements contained in the main text of the standard and the appendix 5)
- 1.3** **Certification bodies** shall communicate clearly to certified organisations that they would be offering unaccredited services relating to **PEFC ST-MO 2002-1**.

2. Unaccredited PEFC EUDR DDS Certification documentation

- 2.1** The **certification body** shall issue separate PEFC EUDR DDS certificates and separate audit reports and summary audit reports for unaccredited certificates against the **PEFC EUDR DDS module standard**, along with any associated unaccredited certification documentation.
- 2.2** The **certification body** shall not include any accreditation marks or symbols in any unaccredited certification documentation against the **PEFC EUDR DDS module standard**.
- 2.3** The maximum validity of the certificate shall be until the date on which the certification decision for the next audit within the regular certification cycle is made.
- Note:** The PEFC Council may extend the timeframe for the validity of the certificates, according to the evolution of the accreditation assessment of the standard.
- 2.4** On or before the expiry of the unaccredited certificate the certification body shall seek accreditation for delivery of services against **PEFC ST-MO 2002-1**, and transfer the certification to an accredited certificate, otherwise the unaccredited certificate shall expire.
- 2.5** The unaccredited certificates shall indicate that the validity of the certificate issued for **PEFC ST-MO 2002-1:202X** is conditional upon the validity of the organisation's PEFC Chain of Custody certificate (PEFC ST 2002).
- 2.6** In addition, the unaccredited certificates shall:
- specified all products included in the **PEFC ST-MO 2002-1** scope are also covered under the valid PEFC Chain of Custody certificate; and
 - include in a visible place the following statement: certification against **PEFC ST-MO 2002-1** does not constitute verification of compliance with Regulation (EU) 2023/1115 (EUDR), and that responsibility for compliance with the EUDR remains with the organisation.

- 2.7** The certification number format shall follow PEFC ST 2003 (e.g. AAAAA-PEFC-EUDR-78910), and shall ensure the linkage between the **PEFC ST-MO 2002-1** unaccredited certificate and the associated PEFC Chain of Custody certificate is clear and traceable.

Appendix 6 (Informative): Example of an unaccredited certificate issued against the PEFC EUDR DDS module



Certificate of Compliance to PEFC ST 2002-1 (EUDR DDS module)

This is to certify that **[Company name]** [Company address]

Has been independently audited and certified as meeting the requirements of the following standard, in its valid version as presented at the PEFC website www.pefc.org:

- PEFC ST 2002-1:202X, Requirements for the Implementation of PEFC EUDR Due Diligence System (PEFC EUDR DDS), dated xx/xx/202X **#1 #2**

This unaccredited certificate is issued in relation to PEFC ST 2002-1:202X only and shall be used in conjunction with the organisation's valid PEFC Chain of Custody certificate (PEFC ST 2002).

Scope of certification: Production and trade of particleboard for furniture and veneered panels for flooring

CoC method(s): physical separation and percentage method

Products covered under PEFC ST 2002-1:202X: **#3**

- **050500 Particleboard**

PEFC ST 2002:2020 CoC Product(s)

- **050500 Particleboard**
- **050200 Plywood**

"Certification against PEFC ST 2002-1:202X does not constitute verification of compliance with Regulation (EU) 2023/1115 (EUDR), and that responsibility for compliance with the EUDR remains with the organisation".

Certificate number: AAAAA-PEFC-EUDR-78910 **#4**

"This PEFC EUDR certificate is linked to PEFC chain of custody certificate AAAAA-PEFC-COC-123456. If the PEFC chain of custody certificate is suspended, withdrawn or terminated, this PEFC EUDR certificate is automatically suspended, terminated or withdrawn.

Certificate type: Individual **#5**

Note: The validity of this certificate shall be verified through the PEFC Find Certified: www.pefc.org/find-certified.

Issued by:

[Certification body name]

[Certification body address]

PEFC EUDR Issue Date: 24 April 2026 #6	PEFC CoC Issue Date: 30 September 2025
PEFC EUDR Expiry date: 23 April 2027	PEFC CoC Expiry date: 29 September 2030

Signed on behalf of [Certification body name]

[Name & Position]

[Signature]

Seal of Certification Body

Notes for example certificate

All certification documentation shall follow requirements of PEFC ST 2003:2020 and any relevant guidance issued in PEFC GD 2001.

- #1 The PEFC ST-MO 2002-1 shall be inserted as the standard where the separate certificate has been issued by a certification body whose accreditation scope has not yet covered PEFC ST-MO 2002-1
- #2 Certification body indicates clearly in writing in the certification documentation that: This unaccredited certificate is issued in relation to PEFC ST-MO 2002-1 only and shall be used in conjunction with the organisation's valid PEFC Chain of Custody certificate (PEFC ST 2002).
- #3 Any product covered under the PEFC ST-MO 2002-1 shall also be covered under the PEFC ST 2002:2020. However, not all the products covered under the PEFC ST 2002:2020 may be covered by the PEFC ST-MO 2002-1. Therefore, the certification body indicates in writing on the certification documentation that all products included in the PEFC ST-MO 2002-1 scope are also covered under the valid PEFC Chain of Custody certificate. If the certified organisation takes its whole product scope into both standard scopes then this shall be clear on the certificates, e.g. "The following products are available under both PEFC ST 2002:2020 and PEFC ST-MO 2002-1"

A note shall be included to make it clear that this is not indicating conformity against the EUDR legislation, e.g., "Certification against PEFC ST-MO 2002-1 does not constitute verification of compliance with Regulation (EU) 2023/1115 (EUDR), and that responsibility for compliance with the EUDR remains with the organisation".

- #4 **Certificate number** is uniquely identifiable, and follow PEFC ST 2003 format, and the associated PEFC Chain of Custody certificate is clear and traceable.

e.g., AAAAA-PEFC-EUDR-78910

"This certificate is linked to PEFC CoC certificate AAAAA-PEFC-COC-123456"

- #5 The certificate type shall be clear. This example shows an individual certificate. For Multisite and producer groups the certification documentation shall make it clear what COC control methods and which product groups and which scopes are available at each participating site (especially for producer groups).
- #6 The issue date and expiry date of the separate certificate shall be clear. The expiry date of the separate certificate shall be one year from its issue date. The validity of the separate certificate shall be conditional upon the validity of the organisation's PEFC valid Chain of Custody certificate (PEFC ST 2002). The validity and expiry dates of the organisation's chain of custody certificate and of the separate certificate shall be clearly written. This can be followed by the method shown on the example.