

NEPCon LegalSource™ Standard

Synopsis from standard development process

This document describes the results from two rounds of stakeholder consultations related to the development of NEPCon's [LegalSource Standard](#).

NEPCon is an affiliate member of the ISEAL Alliance. We are embracing a transparent and multi-stakeholder based approach to maintaining the highest level of stakeholder consensus to ensure high quality of our standards and procedures. NEPCon is committed to a policy of open source on our environmental services and we therefore encourage public comments and inputs to standards and procedures. Comments are also welcome outside the official consultation periods.

Summary of public consultation

First consultation round

The first draft of the LegalSource Standard was sent out in a 60 day period of stakeholder consultation and staff review from 16 December 2011. This followed a mapping exercise in which a broad range of stakeholders were identified. The stakeholder map included representatives of private companies, environmental organisations, standard setting organisations, and government officials as well as a number of NEPCon and Rainforest Alliance staff.

Furthermore, the standard review was announced on the [NEPCon website](#), in the NEPCon/Rainforest Alliance newsletter Certified Wood Update and advertised in staff emails through an email banner.

Second consultation round

The second draft of the LegalSource standard was sent out in a second and final 60 day public stakeholder consultation from 4 October 2012. All active stakeholders were consulted via stakeholder meetings to discuss potential changes in more details. In addition, the standard review was announced on the NEPCon website ([link](#)), in NEPCon/Rainforest Alliance newsletter Certified Wood Update, published on the [ISEAL Alliance website](#) and advertised in staff emails through an email banner.

All comments received have been incorporated in the table 1 below, along with the response and appropriate actions taken.

Table 1: Stakeholder comments

Standard section	Subsection	Comment	NEPCon comment
General		.. suggests that it assumes a fair, just legal system, particularly with regard to rights in land and forest products. My own experience suggests that such a fair, just legal system does not typically exist in tropical forests, where I presume this will also be applied. Having worked on certification documents in the past, I don't have an answer, except to stress what you've called 'due care' in the glossary. It does seem a danger though that people who have what most would consider legitimate rights to land or forest products can have their actions simply declared as 'illegal' by unjust governments...and this is likely to be even more of a problem as countries to get hold of REDD+ benefits and claim rights to carbon".	NEPCon agrees with this concern. However the EUTR and thus LegalSource can only relate to what is legally required in the country of origin. The fact that some governments misuse legal frameworks can only be addressed in so far as it is considered illegal. It should be underlined that these larger scale governance issues are key parts of the FLEGT processes and naturally the hope is that these issues will improve under VPAs.
Section B		The legality definition is detailed; however this does not necessary meet the intent of the regulations to stop serious large scale illegal logging. The definition goes beyond the regulation and contains elements that are not possible to gain access to without carrying out on-site evaluation at the FMU level. Legal employment, H&S	The threshold for when a risk of legal non-compliance against a specific legal requirement can be considered to constitute a significant issue shall be determined based on an evaluation of the scale and impact of the potential non-compliance. The reason NEPCon has chosen to include a detailed list of applicable legislation is that it will be the risk that determines if the issues is significant enough to warrant risk mitigation. It is the opinion of NEPCon that the risk assessment should define which areas to be further evaluated and potentially mitigated, instead of limiting the scope of applicable legislation.
Section G		Another thing I have reacted on is that I cannot find anything on action plans. Example: Say that you make an audit and you have remarks. First I think that they have to be graded like FSC's Major and Minor. Minor could be seen as a warning and checked next time of within 6 months and a major should result in an action plan to be sent in within 4 weeks and corrected no later than 3 months. For what I understood Skogsvårdsstyrelsen, this is how they will do as well. A minor deviation has to be corrected, a major could be linked to a "vite".	The LS programme is constructed such as allowing the companies undergoing a pre-assessment that would in principle function the same as a FSC pre-assessment or gap-analysis. During this potential gaps would be identified and would allow the company to address these before going for full certification. Similarly during the period of certification, we do issue corrective actions requests similar to the FSC system (minor and major), thus allowing for improvement in systems. However, we would naturally not issue a minor CAR for issues where there is an identified risk that illegal timber is placed on the market, as we would place our client and ourselves in a very risky position. But as you mention, the system is not there to close the business down, but also to allow for continuous improvement - very similar to the FSC system.
Requirement 5.2		However, while using your second draft, I made some notifications. Especially on your chapter 5.2 on mixing goods. To put it direct, this is a show stopper for us, and I am sure this is valid for other industries as well. In the chart below I try to show you why. To make a multilayer 3-strip product you are dependent on different lengths of	The second version of the standard has been revised to clarify that LS certified material cannot be sold with a LLS claim when material is mixed with it that has not been evaluated against all LS requirements. The scope of the LS standard does not only relate to the borders of EU, but are relevant to all entities that wish to exclude illegal timber. It has therefore been decided that also entities that function

		<p>the strip to get a pattern that look nice. We also grade the material into different looks where Nature is the dominant one. This is a result of how the Lord created the trees. For one batch it might happen that the quality is so good that you can get out 40 cm's length of the whole batch. But from another supplier you get out only 30 and 35 cms. But this is OK as we mix all of them in the flow. As we are talking many wood species and in many sizes and thicknesses, this is only one example. To keep this separated will need investments in new warehouses. This we cannot accept and I cannot see any link to the legislation either.</p> <p>At the same time I can understand it from your point of view that there might be cases where you have a justified fear that a company wants to fraud the system. This can be solved with an additional text saying something like: After a risk analysis, NEPCon might consider demand to keep LegalSource Certified material separated from non-certified. And then some words or examples where this rule might apply for instance trading through many middle men (We are running a process industry and we can't handle material like a local carpenter)</p>	<p>as Operators within the EU should be confirmed to meet the LS requirements if the material is mixed with LS certified material to be sold with a claim (off-product).</p>
Section B		<p>Whilst the NEPCon Standard does state that it is limited only to providing independent certification of supply chains (B: Scope, paragraph 1), it does not continue this logic by further stating that certifying the timber products themselves falls outside the scope. I feel this limitation should be made more clearly and emphatically so as to avoid any possible confusion for consumers. Moreover, in the context of EUTR/Lacey, as the legal test is on the product itself and not just the supply chain, users should be clear on this intrinsic constraint within the NEPCon Standard.</p> <p>In my experience, with some certification schemes, consumers/retailers are more often than not under a false impression that the product itself has been verified as opposed to the supply chain, and I would hope that the NEPCon Standard can make every effort to avoid similar potential misunderstanding.</p>	<p>The IS standard can be used for product certification. This does not mean that there necessarily is full traceability back to the origin of every single piece of material. But it is known that every piece of material has a known origin and that the risk of illegal harvesting has been assessed as low of mitigated.</p>
Acknowledgement		<p>Understandably this Standard seems to noticeably "borrow" from Smartwood's generic standards. Is some form of acknowledgement appropriate?</p>	<p>The standard has been developed by NEPCon. There may be similarities with the structure of FSC standards that are similar to the fashion that RA standards has been developed, but the standard contents itself has not been copied.</p>
Section G		<p>I am unclear how compliance to this section will be monitored and evaluated.</p>	<p>Compliance will be evaluated by annual audits.</p>
Section G		<p>Are other forms of accreditation acceptable - e.g. would ISO accreditation for a Ringsted timber trader against the NEPCon standard be acceptable? Indeed the whole section seems to demand some form of ISO management system, or similar, is in place.</p>	<p>Other types of systems are in principle acceptable if they meet the intend of the LS requirement. However we would not accept, at this point in time, the evaluation of other certification bodies, as meeting the NEPCon requirements for certification. This could change if ASI takes over the quality management of the LS standard and accredits other organisations to certify against the standard.</p>

Section B		<p>When it comes to the question about applicable legislation then I participated in the Swedish EU TR reference group meeting yesterday where the Swedish CA presented their view on what legislation that would be considered applicable in Sweden. Their approach is to consider only the Forestry Act (Skogsvårdslagen) and the Environmental Code (Miljöbalken). The Forestry Act covers the following issues:</p> <ul style="list-style-type: none"> • Reforestation • Forest felling • Notification and permission of regeneration felling • Insect damage • Natural consideration and cultural heritage • Reindeer husbandry 	<p>LS standard includes a generic framework for identifying applicable legislation that has been developed with inputs from FSC, EFI and ClientEarth. It is the opinion that all these types of legislation should be used in the evaluation of risk.</p>
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annex 5		<p>Some requirements in the LegalSource Standard do not apply if material is already certified under a recognised certification schemes, and a list of schemes NEPCon recognises is given. This raises four questions/issues with regards annex 5.</p> <p>a) VLC I note that “timber sold under the Rainforest Alliance VLC verification system” is recognised. As noted there seems to be close connections between this NEPCon standard and the VLC standard. However these similarities appear concentrated in annex 2 and annex 3 (FME and CoC requirements). Indeed annex 5 highlights meeting the requirements of these aspects of any scheme eligible for recognition. Annex G of the NEPCon Standard has (arguably) critical elements that are not in the VLC Standard. Examples include: I. assessment of the level of risk of illegal forest products entering the supply chain, including risks in following areas; II. risk mitigation measures; III. publicly available policy stating a commitment to sourcing responsibly; IV. annual internal audits (made available to CB). Furthermore the NEPCon standard leads very quickly and forcefully (page 2, introduction) with the “the LegalSource Standard requires organisations: 1. Make a public commitment....; 2. Have access to information; 3. Conduct risk assessments; 4. Mitigate the risks.....” Do “recognised schemes” not have to meet these requirements and if so what is the rationale behind this omission? b) Evaluation of Recognised Schemes Where can I find the evaluations and rationale of the schemes already recognised and how were the evaluations conducted? c) FSC In this list NEPCon states “the FSC system will also meet the requirements once it makes planned changes to its system”. Can this be elaborated on? It seems a potentially contentious issue to include a scheme based only on “planned changes”. d) Recognition It would be useful to have some indication of the process for applying to be a recognised certification scheme.</p>	<p>The LS standard recognises other standards for their ability to minimise risks of illegal logging - not for fulfilling all DD requirements of the LS standard or EUTR.</p> <p>FSC is considered to have closed all gaps against the EUTR when the standard was finalised.</p> <p>NEPCon has based current recognition on our current experience and knowledge of the systems recognised. There has been no formal recognition process carried out by NEPCon at this point in time, which is why we have only recognised schemes that we have a thorough understanding of.</p>
Requirement 8.1		<p>Need to think about composite material and 'geographical risk assessments of material' going into these products. E.G boards manufactured in china using waste material from plantations and mills. Hard to determine source for all but low risk due to transport costs. So if in a Guangxi district low risk but high risk product etc. Also think recycled material</p>	<p>This would be part of the risk assessment, but not specifically mentioned in the standard. It would depend on the specific type of products and origin of material.</p>

Annex 1		re. 4: I think this term needs clarification when talking about communities. And then the differentiation between those and indigenous people. Third party is a bit vague.	Third party is a term used by the EUTR
Introduction		What is the motoring system to ensure compliance with standard? Are there audits, what is the frequency? What is the duration of a certificate? What happen to the certificate and claims (present and past) when lack of compliance with standard is found?	This is part of the quality management system for managing audits. This is not part of a normative standard.
Introduction		Please do not call it a certificate! Too many certificates, call it a verification, call it anything but certificate! Same goes for line below - certification. NO thanks!	NEPCon believes certification is the correct term.
Section B		The issue of variety of legal frameworks needs to be further explained and iterated. The list provided below can only be seen as examples, it is not exhaustive	Expanded on
General		standard is comprehensive, but very hard to comply with	Yes...
Introduction		What is a quality system? Is it ISO9000? Ori s it a system to manage their risk?	The quality requirements are explained in the standard.
Introduction		If this is a due diligence system (as described here) them the name is a mis-nomer. What are NEPCon verifying - the products & source or the whole system? Or both??	LS certification includes the opportunity to implement a risk based system as well as a product legality certification.
Introduction		So far the US Lacey Act does not have specific Due care requirements, it just requires Due care -misleading, especially as the US System is rather based on an import declaration	Correct.
Introduction		The Australian System is not even properly implemented, this is a bit far fetched	It will be Nov. 14, so we have included to ensure future relevance.
Introduction		Sounds like the role of the monitoring organisation to me. Do NEPCon have the right level of insurance for the claims that might come if they by setting themselves as confirming compliance but later sued by a client who was prosecuted?	NEPCon does not assume legal liability for the obligations on Operators by certifying their DDS.
Introduction	Scope	This can only be guaranteed, if NEPCon has been acknowledged as a monitoring organisation. For now this is quite a bold statement.	NEPCon is now a MO.
Introduction	Scope	The issue of variety of legal frameworks needs to be further explained and iterated. The list provided below can only be seen as examples, it is not exhaustive	Agreed.
Introduction	Scope	Are these definitions taken from the Regulation? There should be some reference	Added.
Introduction	Scope	It should be clarified that the list of activities/regulations is not exhaustive	Added.
Introduction	scope (4.1)	Should be better linked to the explanation of customary rights under 1 (or explain differences)	NA
Section D		Have they amalgamated all of these? They either need to quote all of them line by line, or write their own and make sure they cover all angles	NA

Section E	Acceptable	Why call the standard legal source but call what is "certifies" "acceptable". Seems odd	NA
Section E	Un-acceptable wood	Products of unknown origin are unacceptable? What companies are required to do with unacceptable products? What is the consequence if it is not done?	Requirements has been reworded to assure that material with unknown origin is properly handled.
Section E	Low Risk	This does not reflect the EUTRs definition, where negligible risk does not equal low risk! This should be kept in mind, especially with regard to the guidance provided by the Commission, which talks of a negligible risk, if no risk can be identified - the definition here should be revisited	NEPCon do not agree on the interpretation of the EUTR definition of negligible risk. The guidelines states <i>"Negligible risk should be understood to apply to a supply when, following full assessment of both the product-specific and the general information, as covered by the elements contained in the questions above, no cause for concern can be discerned."</i>
section E	Organisation	This is rather confusing. Is this a Certification body or an operator or can it be both? Are the organisations applying the standard or take care of the application by operators	Revised
Introduction	scope	legality definition, page 5 ff.: 1.3 generally propose to replace "competent authorities" with designated authorities as this could cause confusion especially in the context of the EU TR where the term has a specific meaning (and also those in question are at times not that competent really)	-
Introduction	scope	3.2 "potential habitats" seems to be open for a wide interpretation and therefore will pose to be difficult to verify, also no reference to it in Annex 1, section 3.2. So either be more specific or delete it	-
Introduction	scope	3.3 refers to EIA, yet there might be countries without the requirements for EIAs or a different name is used. Propose to add "or equivalent legislation pertaining to nature and biodiversity conservation" or something along these lines	Revised.
annex 1	3.1	3.1 duplication of bullet points 1 and 2 = 7 and 8	Revised
annex 1	3.5	3.5 free association and discrimination not mentioned here, but mentioned in legality definition	Revised
annex 2		Header of left column says legal right to harvest, adjust to sc operations propose to add FLEGT licenses and to make a point that forging certificates of voluntary sustainability. schemes is not acceptable either	-
annex 5		strong statement to exclude other LVs and PEFC,	NEPCon has not reviewed those system to a level that allow recognition or the contrary.
Section G		What is the role of this standard? Is it voluntary, binding? The biggest question however is, how the proper implementation of this standard will be guaranteed by NEPCon (including frequency of checks)	There will be a binding contract as a requirement to be certified.
Section G	1.2	Does NEPCon has a policy that defines how to engage or disengage with companies in cases when NEPCon has evidence of material used that is out of the scope of the certificate comes from illegal origin?	Yes.
section G	1.2	In addition, a monitoring organisation will have to report operators in case of serious or repeated failure....	Agreed
section G	2.1	Responsibility towards whom - NEPCon?	It's a policy commitment
section G	3.2	Please provide details on what document or add a reference to where details on documents can be found.	That is part of their quality system.

section G	4.1	Please provide details on monitoring systems or add a reference to where details on monitoring can be found.	Not part of the standard
section G	4.5	Is this the case with corrective actions that are being implemented with clear timelines? Please provide details on what cases claims are not allowed or add a reference to where details can be found.	Revised
section G	5.1	This is again confusing as this is supposed to be a standard provided by NEPCON but it is unclear, who is meant here (NEPCon, other systems, the operator?)	NA
section G	5.2	What if these products do not fall under the EUTR?	If the company wants to make LS claims they shall also be included.
section G	5.2	Why. Is it all legal?	Revised
section G	6.1.4	For 6.1.4 not all requirements of the EUTR are fulfilled, naming of sub-region or concession where applicable would need to be added	It is included at a later stage.
section G	6.1.4	6.1.4. Please add clarify that country of origin means country of harvest (where timber was harvested)	Agreed. Should be country of harvest.
section G	6.1.3	6.1.3. by volume, it should be encouraged to have details on units and m3 or tonnes.	Added in guidance
section G	6.1.6	Should give a note about NDAs and confidentiality.	Noted
section G	6.2	Who is to say which countries are high risk or not. Is this CPI again? Also if it is a composite material probably forest level will not be possible. Could you think about also adding a risk assessment by product and then the level of resolution could be set by that. Be it 20 miles from the mill or district etc.. to allow for different types of inputs such as waste material or recycled. to give more options than just country and then forest could help	Based on risk assessments as under the Forest Legality Assessment Framework. CPI is definitely part of the initial risk identification., but it is the clear objective of the LegalSource Programme that risks shall be specified at a higher level of detail in order to allow efficient risk mitigation.
section G	6.2.1	Please provide details on criteria used to "confirm and document" this situation or add a reference to where details can be found	Revised
section G	7	Risk Assessment will benefit from a reference to the different relevant Annexes or the table from page 5-7 detailing the scope of legality adopted in this standard.	Agreed
section G	7	Risk assessment should be undertaken before risky products can enter the supply chain	Yes
section G	7.1	What does managed legally mean?	To be managed according to applicable law.
section G	7.2	Suggest separating the points in 7.2 bans then conflict	revised
section G	7.2	Also product bans such as log export bans	Export bans are national legislation
section G	7.3	What does that mean? Why not have LOW risk and HIGH risk. Specified risk is PC nonsense.	Because specification of risk allows efficient risk mitigation.
section G	7.3	Please check with definition, where low risk equals negligible risk which is not reflecting the spirit of the law.	Revised
section G	8.1	Need to think about composite material and 'geographical risk assessments of material' going into these products. E.G boards manufactured in china using waste material from plantations and mills. Hard to determine source for all but low risk due to transport costs. So if in a Guangxi district low risk but high risk product etc. Also think recycled material	Agreed

Section G	8.1	Guidance: Review and make more clear	Revised
section G	8.1.1	Provide more guidance on what types of activities could be mitigating actions	Included in DD guidelines
Section G	8.1	Is this a standard? There seems to be lots more advice than in many standards documents!	NEPCon has focused on providing clear guidance to normative requirements.
Annex 1		It looks very similar to the GFTN/TRAFFIC legality certification framework	They are both legality frameworks, so that is natural. We did not think that the GFTN standard is a certification standard?
annex 1	5.1	Please provide details as an example	
annex 1	3	I forgot to mention yesterday that in a number of countries, the concessionaire is all too often not the enterprise which is carrying out logging operations - usually because the logging enterprise would not be allowed to be a concessionaire - for example because it is foreign and export-oriented - and the concessionaire has illegally subcontracted those logging operations. The standard should include suitable assessments of this. I am thinking particularly of PNG, Solomon Islands the South Western part of Republic of Congo - which (via dodgy logging enterprises linked to Sarawak and increasingly China) supply logs to China which we in the EU subsequently import as face veneer on plywood and other products. I suspect that these products account for a large share of the illegal timber which is imported into the EU....	Agreed
Annex 1	4	I think this term needs clarification when talking about communities. And then the differentiation between those and indigenous people. Third party is a bit vague.	Revised
Annex 2	1.1	Add product description	-
annex 2	1.2	More details are required to facilitate verification	-
annex 4	5.3	Should all be on line and accessible to anyone?	Not necessarily.
annex 5	Intro	This could become problematic, if NEPCON would like to become a monitoring organisation as they would not have control to keep the other systems up to date	-
annex 5	1.1	Not surprised that PEFC is not here, but wonder on what basis as legality is perhaps the one thing it does well across many countries	The problem for NEPCon is that there has been no evaluation including all PEFC national standards. Also the new PEFC standard and DDS requirements are found to be insufficient in regard to non-certified.
annex 5		These are not Certification or legality verification schemes in the common sense - it would be better to keep them separate from market mechanisms	-
Section B		Sorry if I have missed it but do you mention anywhere contract period for being certified and audited. How many audits etc..	Not included in the standard, but in contractual agreement and service descriptions

General		<p>1) Generally the standards are perfect and include all the key elements of legal verification and also EUTR. The requirements are very detail and comprehensive. Now the key questions is that how to address the challenges for the SMEs. It's hard for them to meet the requirements or many requirements are not applicable for them. You may take part in some auditing in South China. Most forest there are collective forest which are managed by individual householder or small forest farm. The forest land they owned is just several hectares or even less than 1 ha. I don't think they have the forest management plan as required and also have difficulties in health and safety, legal employment. And also it's difficult for many local small sawn wood or chips factory with just several persons. And not all the requirements are legally required. So NEPCon may develop a specific standards for SMEs or for China?</p>	-
General		<p>1) Again, some of the requirements are not legal required. I think it's important that the legal source standards should be based on the local laws. If no laws or regulations requirements, some of the standards or verifiers could be ignored or not applicable.</p>	Only applicable law will be concerned
General		<p>1) For the risk assessment, which standards the companies should be followed? And the company should trace the wood to which level? Country level, provincial level, county level or FME level? If the company only identify the unspecific risk in transportation area, then they just need to do the risk mitigation in supply chain, right?</p>	-
annex 5		<p>1) Regarding to the recognized certification scheme, now Nepcon only mentioned CITES, FLEGT, RA/VLC, and FSC. How about PEFC, China scheme and other forest certification scheme or legal verification scheme by other CBs?</p>	Those has not been evaluated yet.
Section G	3.3	<p>1) 3.3 in page 22, EIA or SIA should be place and approved by the legally competent authority. That's only for some projects required for EIA or SIA based on the laws, not applicable to all the FMEs.</p>	Agreed
General		<p>The standard does not have a requirement for the organisation to i) determine if the wood supply is from a forest operation in a country that is engaged in a Voluntary Partnership Agreements (VPA). The EU has concluded that a number VPAs with third countries contain a detailed description of legislation applicable in those countries that will need to be met to be compliant with the EUTR. Recommend this is added as a primary source of information for determining which laws and how to demonstrate compliance with them to ensure the supply of timber from such countries is legal where it is detailed and agreed under a VPA. VPAs are posted here: http://ec.europa.eu/environment/forests/flegt.htm</p>	This will be added to our DD guidance.

General		The standard needs to reflect the EC guidance document better. For example to include the guidance on what is negligible risk and the need to cover both product specific information as well as general information on the context. Also, noting that the level of governance that can undermine the reliability of documents etc. and that additional mitigation measures in these cases will need to be managed.	This is covered in the due diligence guidelines
General		We recommend the standard is clearer on which requirements from the Legal Source standard fall away when an operator uses certified timber that is recognized by Annex 5. A company should execute a full due diligence system, certification schemes do not have a green lane, but are only used as a risk mitigation strategy and a tool to get and verify the required information.	Those requirements that fall away are clearly identified in the standard. All other requirements apply.
Section G	4.3	4.3: States that the organisation should ensure all non-conformances are addressed and corrected in a timely manner. This is to open ended, clarify or add reference to applicable NEPCon/Rainforest procedures on managing and closing out non-conformances.	This is covered in the NEPCon auditor handbook. This does not belong in a normative standard.
Section G	6.1.4	6.1.4: Country (or pool of countries) of origin: this is tricky as you need to know per species what the provenance is to assess risk. It needs to be made clear that it is not enough to come up with a pool of species and a pool of countries. Risk can vary per country where the species is harvested. So it needs to be clear which specific countries the species is harvested.	Guidance has been added
Section G	6.2	6.2: For example, in cases where material can be confirmed to originate from a low-risk country, the details of the supply chain are not needed. This is the other way round. You cannot establish negligible risk if you do not have the details of the supply chain. So you always need details of the supply chain in order to establish negligible risk. This is also reflected in the EU guidance document: Failure to establish necessary info at any point in supply chain will increase possibility of illegally harvested timber entering the chain. A company always has to conduct a full assessment of the product specific and general information in its risk assessment, according to the guidance document from the EC.	This is included in the standard and risk assessment flow.
Section G	6.3.1	6.3.1: Why is this not taken one step further and asking suppliers to sign a supplier declaration that it complies with the organisation's policy for legal sourcing/procurement and request this to be done down the supply chain. If this is covered in 6.3.5 then ignore comment.	This has been clarified and is part of the DDS where applicable.
Section G	8.1	8.1 References mitigating the risks identified listed in '6.1' but this is a typo and should refer to the risks listed under 7.1	corrected
Section G	8.1	8.1 Related instructions: It is not clear how often and when audits should be carried out in areas of high risk.	Covered in the auditor material
Section G	9.2	9.2 The standard needs to be more specific on what public claims are permitted (we do not want legality certification to compete with sustainability certification on the consumer markets). Recommend adding an Annex with sample text.	The claims guidance contains this information

Annex 5		Recommend clarifying requirements around reporting (including whether public summary reports are required), is stakeholder consultation required on these audits, information on dispute resolution mechanism etc.	
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