

# **Standard setting report**

**2025-07-31**

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## **Revision the PEFC Luxembourg forest certification scheme 2023-2025**

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## 1 Introduction

PEFC Luxembourg, a.s.b.l is a governing body of a national forest certification scheme (here-in-after “the scheme”) that was firstly adopted on 18 June 2009 and then revised in 2013 and 2018.

The scheme was re-endorsed in November 2019 ([www.pefc.org](http://www.pefc.org)). Following the PEFC Council requirements for the scheme development and revision (PEFC ST 1001) and scheme endorsement (PEFC GD 1007), the PEFC Luxembourg scheme shall start the review process in May 2023 and finalise the revision in May 2025.

In January 2023, PEFC Luxembourg decided to start the review and revision of the scheme documentation with the objective to submit revised documentation in time allowing the revised scheme to be submitted for the PEFC re-endorsement by May 2025.

## 2 Scope of the revision process and this report

The revision process was started by PEFC Luxembourg in January 2023, based on the revision project proposal<sup>[4.1]</sup> that was approved by the PEFC Luxembourg’s Board of Directors (BoD) on 31 January 2023<sup>[6.1]</sup>.

The scope of the revision was:

- to review the current scheme requirements on experience from the on-going forest certification;
- to review approaches in neighboring countries (Germany, France, Belgium) that can be relevant to the improvement of the scheme effectiveness and efficiency;
- to incorporate changes in the Luxembourgish forest policy and related legislation;
- to identify and develop synergies with forest related European legislation in particular with RED II (Directive (EU) 2001/2018), RED III (Directive (EU) 2023/2413), and the European Deforestation Regulation (Regulation (EU) 2023/1115);
- to build consensus on any other demands of PEFC Luxembourg stakeholders relevant to forest certification;
- to incorporate changes in the PEFC Council (International) documentation;
- to use the revision for promotion of the PEFC scheme;
- to ensure endorsement of the revised scheme by the PEFC Council’

The revision intended to use the existing structure of the scheme documentation as included Annex 1. Following the Standard setting procedures<sup>[1.1]</sup>, the full standard revision process was applied to the scheme’s forest management standard (LFCS ST 1002).

The revision work was based on and governed by *LFCS PD 1001*<sup>[1.1]</sup>, *Standard setting procedures* and was open, transparent, and consensus based.

This standard setting report is based on chapter 5.6.1.1 of *LFCS PD 1001*<sup>[1.1]</sup>.

### 3 Governance of the revision process

In accordance with *LFCS PD 1001* <sup>[1.1]</sup> the following organisational arrangements were applied for the revision of the scheme:

#### 3.1 PEFC Luxembourg General Assembly (the GA)

The GA was responsible for the formal approval of the scheme's standards.

#### 3.2 PEFC Luxembourg Board of Directors (the BoD)

The BoD fulfilled the following functions in the standard setting process:

- approval of the project proposal <sup>[4.1]</sup>,
- approval of the standard setting procedures <sup>[1.1]</sup>
- establishment and dissolution of the Technical Committee for the revision of the scheme's standards,
- recommendation of the final draft (FD) standards for formal approval by the GA.

#### 3.3 Technical Committee (the TC)

The TC was established by the BoD on 9 January 2024<sup>[6.2]</sup> with the objective to build consensus amongst participating interested stakeholders and/or experts.

The TC consists of balanced representation of the following stakeholder categories:

- A. **Primary producers** including forest owners and managers;
- B. **Processors**, including forest related industries;
- C. **Forest users**, including environmental organisations, trade unions, research and academic organisations, hunting associations, hikers, tourism organisations, etc.;

The TC reports to the BoD and can be dissolved by the BoD.

The list of the TC members is included in Annex 3 to this report.

### 3.5 PEFC Luxembourg Secretariat (the Secretariat)

The Secretariat, represented by Mr Michel Dostert, was responsible for the implementation of the procedures of *LFCS PD 1001* <sup>[1.1]</sup>. The Secretariat arranged all contacts between the TC and the BoD. In particular, the Secretariat was responsible for:

- preparation of the project development process and project proposal,
- providing secretarial and administration support to the TC,
- announcing the start of the project development process,
- administration of the public consultation,
- publication of the approved documentation.

The Secretariat was supported by a TJConsulting, an independent consultant represented by Mr. Jaroslav Tymrak.

## 4 Description of the revision process

The PEFC Luxembourg started to comprehensively review and revise its forest management standard in 2023 with the target to publish a new standard in May 2025.

The process consists of six stages as defined by *LFCS PD 1001* <sup>[1.1]</sup>: proposal stage, review stage, revision preparatory stage, Technical Committee stage, enquiry stage, formal approval stage and publication stage.

Standard setting stages		Responsibility
<b>Proposal stage,</b> Dec 2022 – Jan 2023	Project development	The Secretariat
	Project approval	BoD
<b>Review stage,</b> March – Oct 2023	GAP analysis on PEFC international documentation	The Secretariat
	GAP analysis on Luxembourg legislation	The Secretariat
	Analysis of the feedback stakeholders	The Secretariat
<b>Preparatory stage,</b> Oct – Dec 2023	Stakeholders mapping	The Secretariat
	Review of the standard setting procedures (LFCS PD 1001)	The Secretariat
	Public announcement	The Secretariat
	Invitation of PEFC Luxembourg's members and other stakeholders	The Secretariat
	TC establishment	BoD
	Development of a working draft	The Secretariat
<b>TC stage,</b> Jan – Dec 2024	Consideration of comments	TC (supported by the Secretariat)
	Consensus building	TC
<b>Enquiry stage,</b> July – Sep 2024	Public consultation	The Secretariat
<b>Approval stage,</b> May – July 2025	Standard setting report	The Secretariat
	Board of Directors recommendation / approval	BoD
	General Assembly approval	GA
<b>Publication stage</b> July 2025	Publication of the scheme documentation	The Secretariat

#### **4.1 Summary of the review and revision process**

- PEFC Luxembourg conducted gap analysis on the PEFC forest related legislation and PEFC International requirements,
- PEFC Luxembourg has launched a comprehensive revision process,
- The TC has met four times in person <sup>[5.1-5.4]</sup>.
- The TC was working on several drafts of the forest management standard<sup>[2]</sup>.
- Enquiry draft of the forest management standard <sup>[2]</sup> was sent for public consultation. All comments were analysed and considered by the Secretariat and the TC.
- Based on the comments received during the public consultation the TC reached consensus on Final Draft versions of the forest management standard<sup>[2]</sup> and submitted it to the BoD for a formal approval process. The standard was finally approved by the General Assembly of PEFC Luxembourg.
- PEFC Luxembourg has received neither complaint nor appeal relating to the standard setting process.

## 4.2 Review and revision process

The detail of the revision process divided into six phases as presented in tables below.

### Phase 1: Proposal stage (Dec 2022 – January 2023)

Purpose	Activities	Outputs
To define the scope, basic principles and phases of the review / revision process	<ul style="list-style-type: none"> <li>The Secretariat together with TJ Consulting prepared a revision Project Proposal paper<sup>[4.1]</sup> which defined the scope, basic principles, phases, responsibilities and timetable of the revision process.</li> <li>The document was presented to the BoD and adopted at its meeting on 31 January 2023<sup>[6.1]</sup> and presented to public as a part of the announcement of the start of the standard setting process<sup>[7.2]</sup>.</li> </ul>	Project Proposal <sup>[4.1]</sup>

### Phase 2: Review stage (March – October 2023)

Purpose	Activities	Outputs
To identify the need for revision of the standard	<ul style="list-style-type: none"> <li>The Secretariat together with TJ Consulting conducted gap analysis of the standard and Luxembourgish forest related legislation<sup>[4.4]</sup></li> <li>The Secretariat together with ANF (Administration de Nature et de Forêts) conducted gap analysis of Luxembourgish forest related legislation<sup>[4.3]</sup></li> <li>PEFC Luxembourg has established at its website a permanent mechanism for collection of feedback from stakeholders<sup>[7.1]</sup>. Since the operation of the forest management standard, no comment from a stakeholder has been received.</li> <li>The review resulted in a need to revise the forest management standard<sup>[6.2]</sup>, mainly for the purposes of integrating PEFC ST 1003 changes made in 2018.</li> </ul>	Gap analysis <sup>[4.3, 4.4]</sup>  Consideration of stakeholders comments

### Phase 3: Revision preparatory stage (November 2023 – January 2024)

Purpose	Activities	Outputs
Revision announcement	<b>Stakeholders mapping</b> The Secretariat carried out a stakeholders mapping exercise <sup>[4.2]</sup> that resulted in a list of	Stakeholders mapping table <sup>[4.2]</sup>  The TC

Establishment of the TC	stakeholders relevant to the revision process (92 stakeholders were identified) including identification “key” stakeholders.	established,
Development of first draft documents	<p><b>Announcement of the start and invitation of stakeholders</b></p> <p>The Secretariat publicly announced the start of the revision on 20 July 2017 at its website <sup>[7.2]</sup>, including a press release <sup>[7.3]</sup> and invited all interested parties to (i) submit their nominations for the TC; to comment on (ii) the revision project proposal <sup>[4.1]</sup>; and (iii) standard setting procedures, <i>LFCS PD 1001</i> <sup>[1.1]</sup></p> <p>Following the stakeholders mapping, a direct invitation email<sup>[7.4a]</sup> with an invitation letter<sup>[7.4b]</sup> was sent out to all 92 stakeholder organisations identified in the stakeholder mapping<sup>[4.2]</sup>.</p> <p>A press release<sup>[7.3]</sup> was distributed to more than 40 press organisations in Luxembourg<sup>[7.5]</sup>.</p> <p>The announcement was published at the “forest owners association” website (Privatbesch)<sup>[7.6b]</sup> and was distributed to more than 500 members of the Privatbesch<sup>[7.6a]</sup>.</p> <p>The start of the revision process and stakeholders participation in the revision process was announced in a Luxembourgish national newspaper “Wort” <sup>[7.7a,b]</sup></p> <p>The announcement was also published at Facebook<sup>[7.8]</sup>.</p> <p>PEFC Luxembourg has received neither comments relating to the “project proposal” (scope, process and timetable of the proposed revision process) <sup>[4.1]</sup> nor to the standard setting procedures (<i>LFCS PD 1001</i>) <sup>[1.1]</sup>.</p> <p>Based on received nominations from stakeholders, the BoD decided <sup>[6.2]</sup> on the composition of the TC (see Annex 1).</p> <p><b>Review of the standard setting procedures</b></p> <p>Based on gap analysis with PEFC ST 1001, the Secretariat revised <i>LFCS PD 1001</i> <sup>[1.1]</sup>. As a part of the announcement of the start of the standard setting process<sup>[7.2]</sup>, stakeholders were given opportunity to comment on the standard setting procedures. PEFC Luxembourg had received no comments to the document. Therefore, BoD decided to approve the draft document<sup>[6.2]</sup>.</p> <p><b>Preparation of first draft standards</b></p> <p>The Secretariat together with TJConsulting and</p>	First draft of the scheme documentation



	<p>ANF (State forest administration) prepared the first drafts of the scheme standards<sup>[2]</sup></p> <p><b>Establishment of the Technical Committee</b></p> <p>Based on received nominations for the TC, the BoD established the TC<sup>[5.1]</sup>, see Annex 3. All received nominations were accepted<sup>[6.2]</sup></p>	
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#### Phase 4: Technical Committee Stage (February 2024 – June 2025)

Purpose	Activities	Outputs
<b>To build consensus on final drafts</b>	<p><b>Summary of the TC meetings</b></p> <p>The TC started its work at its meeting held on <b>7 February 2024</b><sup>[5.2]</sup>. The purpose of the meeting was (i) to present the revision project, its stages and timetable, (ii) to present the role, responsibilities and procedures for the TC, (iii) to present and discuss the working draft of LFCS ST 1003.</p> <p>The second meeting held on <b>13 March 2024</b><sup>[5.3]</sup> continued in the discussion on LFCS ST 1003. The TC agreed to submit draft standards (enquiry drafts) resulting from the meeting<sup>[2]</sup> for public consultation.</p> <p>The third meeting held on <b>5 November 2024</b><sup>[5.4]</sup> continued in the discussion on LFCS ST 1003 and was considering comments from the public consultation<sup>[3.1]</sup>. The TC agreed to organise a postal ballot amongst the TC members to reach consensus on LFCS ST.</p> <p>In a postal ballot organised on 06 June 2025<sup>[5.5]</sup>, the TC has agreed on the final draft to be submitted to the BoD and GA of PEFC Luxembourg for formal approval. 12 out of 13 stakeholders voted in favour, one stakeholder did not return a vote.</p> <p><b>Management of the TC</b></p> <p>The members of the TC received both the invitation for the meetings as well as related documentation in advance by E-mail from the Secretariat<sup>[5.6]</sup>,</p> <p>All the meeting of the TC were reported in the minutes<sup>[5.2-5.5]</sup> available to all members of the TC shortly after the meeting,</p> <p>Comments and responses of the TC members relating to the LFCS standards were incorporated</p>	Final draft

	in the next versions of the debated standards.	
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### Phase 5: Enquiry Stage (July – September 2024)

Purpose	Activities	Outputs
To consult draft requirements with broad range of stakeholders	<p>Enquiry draft of LFCS ST 1002<sup>[2]</sup> was sent for 2.5 months public consultation that took place from 1 July 2024 until 15 September 2024. The enquiry draft was freely available from the PEFC Luxembourg website<sup>[7.11]</sup>. The PEFC Luxembourg website<sup>[7.11]</sup> included the announcement, draft standard<sup>[2]</sup>, comment form<sup>[7.10]</sup>, press release<sup>[7.15]</sup>, and article about the revision and public consultation<sup>[7.9]</sup>.</p> <p>PEFC Luxembourg distributed by e-mail invitation to participate in the public consultation to the stakeholders identified by stakeholders mapping<sup>[7.13]</sup>, to certified entities<sup>[7.12]</sup>, and to members of the Technical Committee<sup>[7.14]</sup>.</p> <p>The public consultation was announced in the in the national newspaper Wort<sup>[7.17]</sup>, in Letzerbuerger Bauer magazine<sup>[7.18]</sup>, at the website of private forest owners<sup>[7.16]</sup>.</p> <p>During the consultation, no comment had been received. The results of the public consultation was discussed by the TC at its meeting on 5 November 2024<sup>[5.4]</sup>.</p>	Stakeholders comments

### Phase 6: Approval stage (June - July 2025)

Purpose	Activities	Outputs
To formally adopt the requirements	<p>On 10 June 2025, the BoD considered the final draft standard and recommended to the PEFC Luxembourg's GA its approval<sup>[6.3]</sup>.</p> <p>On 18 July 2025, the GA adopted the final draft standard as LFCS ST 1003<sup>[6.4]</sup>.</p>	Formally approved standards

**Phase 6: Publication stage** (July 2025)

Purpose	Activities	Outputs
To publish the standards	<p>On 30 July 2025, the revised standard (LFCS ST 1003) was published at the PEFC Luxembourg's website<sup>[7.19]</sup> and this standard setting report.</p> <p>The publication of the standard was supported by a press release that was distributed to media<sup>[7.20]</sup>.</p>	

**Revision process timetable**

		2022				2023				2024				2025			
		I	II	III	IV	I	II	III	IV	I	II	III	IV	I	II	III	IV
<b>Prop. stage</b>	Project proposal development																
	Approval by BoD																
<b>Review stage</b>																	
<b>Preparatory stage</b>	Stakeholders mapping																
	Public announcement																
	Review standard setting procedures																
	TC establishment																
	Consideration of comments																
	Developing working drafts																
<b>Technical Committee stage</b>																	
<b>Enq. stage</b>	Public and members consultation																
	Consideration of comments																
<b>Appr. stage</b>	BoD meeting																
	General Assembly (GA)																
<b>Publication stage</b>																	

## **5 Evidence on consensus reached**

### **5.1 Consensus building**

Following the PEFC Luxembourg's standard setting procedures (*LFCS PD 1001* <sup>[1.1]</sup>), the primary body for reaching consensus on the standards of the scheme is the Technical Committee (the TC).

#### **a) The TC decision on drafts for public consultation**

The TC meeting of 5 November 2024 <sup>[5.3]</sup> reached consensus on submitting the draft standards<sup>[2]</sup> for public consultation; no “sustained opposition” was presented by any member of the TC and all members present at the meeting unanimously voted on the drafts' submission for public consultation.

#### **b) The TC decision on final drafts for formal approval**

The TC meeting of 5 November 2024 <sup>[5.4]</sup> agreed to organise a postal ballot on the final draft standard <sup>[2]</sup>.

By the means of the postal ballot, the TC reached consensus on the final draft standard<sup>[2]</sup> and recommended the standards for formal approval<sup>[5.5]</sup>.

Members participating in the postal ballot did not present any sustained opposition and unanimously voted for the final draft standards to be formally adopted by PEFC Luxembourg<sup>[5.5]</sup>. One member of the TC (out of 13) did not return the vote.

## **6 Evidence on complaints received**

PEFC Luxembourg has received no complaint or appeal relating to the standard setting activities conducted during 2023 – 2025.

**Annex 1: Structure of the scheme's "Technical Documentation"**

Documentation type	Note
Statutes	The document governing the IFCC organisation, structure, members rights and responsibilities
Standards	Documents defining requirements for key players in the certification.
Guidances	Documents providing guidance or interpretation of the scheme standards
Procedures	Documents defining PEFC Luxembourg's procedures in the development and governance of the scheme

LFCS Standards	
LFCS ST 1001	<b>Luxembourg Forest Certification Scheme – Introduction</b> Includes general description of the scheme, its objectives, basis, approaches and bodies involved.
LFCS ST 1002	<b>Group forest management certification – Requirements</b> Includes requirements for implementation of requirements for sustainable forest management in group of forest owners / managers.
LFCS ST 1003	<b>Sustainable forest management – Criteria and indicators</b> Requirements for the management of natural forests to be met in order to attain IFCC forest certification.
LFCS ST 1004	<b>Requirements for bodies providing audit and certification of forest management</b> Includes requirements for the structure, procedures, accreditation and notification of certification bodies and their auditors involved in forest management certification.
PEFC ST 2001	<b>PEFC Logo usage rules - Requirements</b> Requirements for the usage of the PEFC logo. The PEFC Council international standard to be adopted as a part of the LFCS scheme.
PEFC ST 2002	<b>Chain of custody of forest based products - Requirements</b> PEFC International standard to be adopted by the PEFC Luxembourg as a part of the scheme. Includes requirements for chain of custody in order to use the PEFC claims on forest products.

PEFC ST 2003	<p><b>Requirements for bodies providing audit and certification of chain of custody</b></p> <p>PEFC International standard to be adopted by the PEFC Luxembourg as a part of the scheme. Includes requirements for the structure, procedures, accreditation and notification of certification bodies and their auditors involved in chain of custody certification.</p>
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LFCS Procedural Documents	
LFCS PD 1001	<p><b>Standard setting procedures</b></p> <p>Includes requirements for the development and revision of the scheme</p>
LFCS PD 1002	<p><b>Procedures for investigation and resolution of complaints and appeals</b></p>
LFCS PD 1003	<p><b>Issuance of PEFC Logo licenses</b></p> <p>Procedures for the issuance of PEFC Logo licenses by PEFC Luxembourg.</p>
LFCS PD 1004	<p><b>Notification of certification bodies</b></p> <p>Procedures for formal recognition of certification bodies for forest management and chain of custody certification bodies</p>

## **Annex 2: List of available documentation**

### **1. Procedural documentation**

- (1.1) LFCS PD 1001, *Standard setting procedures*
- (1.2) LFCS PD 1002, *Procedures for investigation and resolution of complaints and appeals*

### **2. Standards**

Several versions of LFCS ST 1002 (finally renamed as LFCS ST 1003) made and discussed during the revision process, including enquiry draft and final draft.

### **3. Lists of comments**

### **4. Analytical papers and proposals**

- (4.1) Revision of PEFC Luxembourg forest certification scheme (en),  
Project proposal, 2023-01-30,
- (4.2) Stakeholders mapping table,
- (4.3) Gap analysis – legislation,
- (4.4) Gap analysis – PEFC ST 1003

### **5. Documentation relating to the TC**

- (5.1) Composition of the TC
- (5.2) Minutes of the TC meeting on 2024-02-07 (fr)
- (5.3) Minutes of the TC meeting on 2024-03-12 (fr)
- (5.4) Minutes of the TC meeting on 2024-11-05 (fr)
- (5.5) Minutes – postal ballot TC, 2025-06-11 (fr)
- (5.6) E-mail communication TC

### **6. Documentation relating to PEFC Luxembourg Board of Directors (BoD) and the PEFC Luxembourg's General Assembly (GA)**

- (6.1) Minutes of the BoD meeting on 31 January 2023
- (6.2) Minutes of the BoD meeting on 9 January 2024
- (6.3) Minutes of the BoD meeting on 10 June 2025
- (6.4) Minutes of the GA meeting on 18 July 2025

### **7. News, press-releases and communication**

- (7.1) PEFC.LU website – permanent feedback collection mechanism



- (7.2) PEFC Luxembourg website: Announcement of the revision start
- (7.2a) Nomination form – participation in the Technical Committee
- (7.3) Announcement : Press release: Révision du « Schéma Luxembourgeois de Certification Forestière » (PEFC) (2023-12-05)
- (7.4a) Announcement: An email to stakeholders with the announcement of the revision process and invitation to the TC (2023-12-05)
- (7.4b) Announcement: Letter to stakeholders, announcement of the process/invitation to the TC
- (7.5) Announcement: E-mail to presse – communication of the press release (2023-12-05)
- (7.6) Announcement: E-mail to members of Forest Owners Association (Privatbesch, 2023-12-15)
- (7.7) Announcement: Order of announcement in Wort journal
- (7.8) Announcement: Facebook
  
- (7.9) Public consultation: Article (de)
- (7.10) Public consultation: Consultation form
- (7.11) Public consultation: website announcement
- (7.12) Public consultation: e-mail certified entities
- (7.13) Public consultation : e-mail stakeholders
- (7.14) Public consultation: e-mail Technical Committee
- (7.15) Public consultation : press release (de)
- (7.16a) Public consultation: website Privatbesch i
- (7.16b) Public consultation: website Privatbesch ii
- (7.17) Public announcement: advertisement Wort
- (7.18) Public consultation: Article Letzebuerger Bauer magazine (5-7-2024)
  
- (7.19) Publication of standard : PEFC Luxembourg website
- (7.20) Press release - Publication of standard / End of the revision process

## **8. Records keeping**

- (8.1) Records keeping – previous revisions

**Annex 1: List of the TC members**

<b>Chamber</b>	<b>Organisation</b>	<b>Contact Person</b>
<b>Primary Producers</b>	Groupeement des Sylviculteurs a.s.b.l.	M. Winfried von Loë
	Administration de la nature et des forêts	Mme Carole Sinner
	Le Phénix Vert	M. Martin Michel
	ANF Délégation des salariés	M. Lamborelle Thibaut
<b>Forest User</b>	FSHCL	Mme Gaby Poeckes
	SICONA	M. Fernand Klopp
	SEBES	M. Spithoven Laurent
	ProSilva	M. Maurice Probst
	Natur&Emwelt Fondation	M. Julien Bosseler
	Naturpark Uewersauer	Mme Gaby Gaasch
<b>Processors</b>	Altwies-Bois	M. Nesser Jacques
	Luxembourg Woodcluster	M. Ralf Köhler
	House of Sustainability	Mme Loesch Anne-Marie