

To the membership of the FSC,

**WE CALL ON YOU TO VOTE “NO” ON THE PROPOSAL FOR THE REVISED FSC P&C.**

The Forest Stewardship Council has recently circulated a revision of the FSC Principles and Criteria for voting by the FSC membership, the highest decision making body. As long-term active members, including founding members, of the FSC, we are keenly aware of the importance of - and are committed to - achieving broad cross chamber support that can advance FSC’s mission to promote environmentally sound, socially just and economically viable management of forests. Regrettably, the proposal for the revised FSC P&C does **NOT YET** meet the threshold for a strong majority.

We recognize and appreciate the progress that has been made on a number of issues relevant to advancing the rights of indigenous peoples and forest dependent communities in Principles 1-4. Community forest management can play an important role for sustaining natural forests and we strongly believe community forest management needs a stronger representation in the FSC’s governance and certified forest management portfolio. However, despite potential gains in some areas, we believe that the weakening of the standard in other areas and the insufficient resolution of key issues requires a “NO” vote until these flaws can be fixed.

Specifically, from an ecological and environmental perspective the new P&C fails to provide appropriate definitions, to retain and improve key safeguards to maintain the ecological integrity of forest ecosystems, or to address the critical role of forests in regulating the climate. The new P&C treats natural forests and plantations as if they were the same thing. International forest campaigners particularly in the context of forests and climate have been actively campaigning to have the two things treated separately for many years. The proposed removal of Principle 10 and subsequent lack of separation of natural forest and plantations has the unintended consequence on one hand of weakening environmental safeguards for industrial logging of natural forest in the P&C and on the other hand strengthening arguments that they should be treated the same way as plantations for carbon accounting purposes. These unintended consequences are further reinforced by the use of poor definitions.

We are deeply troubled that a “yes” vote on the new proposed P&C will lock-in, for many years to come, a policy and standard that sacrifice key environmental values. This will set back the credibility of the FSC system to assure customers that products are indeed environmentally responsible and undermine our collective efforts to date to ensure FSC certification is not used to “green wash” environmentally destructive forest management practices. We appreciate that the bottom-line for the new P&C will be regional and national indicators, and that the forthcoming generic indicators process is supposed to utilize the P&C explanatory notes, some of which are intended to address various stakeholder concerns. However, the indicators

process does not appear to be a sufficient solution – in part because some of the most troublesome elements of the new P&C are other explanatory notes that should *not* be allowed to guide indicator development.

In particular, we call on FSC members to consider the following major outstanding concerns with the revised P&C and cast a “no” vote until these shortcomings can be addressed in a revised P&C:

**1. POTENTIAL FOR CERTIFICATION OF INTENSIVE LOGGING IN PRIMARY FOREST EXPANDED:**

**Criteria 5.2, which replaces current Criteria 5.6, explicitly opens the door for first-entry primary forest logging at levels above those then can be sustained.** In particular:

- Criteria 5.2, Explanatory Note 3, provides for broad exemption of primary forest logging from sustainable harvest expectations;

**2. PROBLEMATIC FOREST DEFINITIONS:**

**Changes to glossary definitions for “forest”, “natural forest”, “native ecosystem”, “non-timber forest products”, “restore”, “long term” and “precautionary principle”,** which together:

- define forests by the presence of trees alone;
- fail to recognize and distinguish highly natural forests from semi natural forests;
- de-link Non Timber Forest Products from any natural forest context;
- eliminate specific meaningful ecological time frames (definition of “long term” deleted);
- adopt a weak definition of the precautionary principle; and,
- put forward a definition of “restore” that is delinked from any pre-existing natural conditions of the area.

**3. BASIC PRICIPLE OF NATURAL FOREST MANGEMENT LOST:**

**Failure to adequately maintain common sense interpretations for the maintenance and restoration of natural forest conditions.** In particular:

- New Criteria 6.6 fails to maintain requirements for enhancement or restoration of native species, genetic, and ecosystem diversity;
- New Criteria 6.6, Principle 10, and Principle 10’s various Criteria fail to maintain the requirements of existing Criteria 6.3 for maintenance and restoration of natural forest regeneration and succession;

- New Criteria 10.1 does not require silvicultural and regeneration practices sufficient to correct degraded pre-harvest conditions; and,
- New Criteria 10.2 fails to sufficiently retain the requirements of existing Criteria 6.3 to maintain a natural diversity of species, and weakens existing Criteria 10.4's preference for native species over exotic species.
- New Principle 6, Explanatory Notes 12, 14, & 15 and Criteria 6.7, Explanatory Notes 3 & 6 go too far in absolving landowners from restoring forests, water quality, and other ecological values where degraded by prior landowners.

**4. NATURAL FOREST RESTORATION THRESHOLDS FOR PLANTATIONS HAVE BEEN WEAKENED:**

**Requirements that plantation certification furthers natural forest conservation found in the current P&C is not adequately reflected in the proposed new P&C.** In particular:

- The requirement of existing C10.2 that “plantations should promote the protection, restoration, and conservation of natural forests, and not increase pressures on natural forests” is not sufficiently reflected in the revised P&C;
- New Criteria 6.5 is written too broadly to ensure that the existing Criteria 10.5's requirement that portions of existing plantations be restored to natural conditions will be met.

**5. DEFINITION AND REQUIREMENTS FOR HIGH CONSERVATION VALUE FORESTS WEAKENED:**

**Effective and consistent protections for HCV forests hinges upon regional/national indicators' adoption of an explanatory note that redefines the more fundamental glossary definition of “precautionary approach.”** In particular:

- The new language at C9.3 and P9 channel all HCV protections through the precautionary approach – which is defined in the glossary and an explanatory note as only being triggered when management activities pose a “threat of severe or irreversible damage.”
- While another note at C9.3 states that “any threat to a HCV is considered to be a threat of severe or irreversible damage,” this is a confusing and too easily overlooked way to truly correct the situation.

We believe it is important that changes to the FSC P&C do not weaken but rather strengthen environmental safeguards and resolve the problematic issues in the existing P&C. We

acknowledge the huge effort by the FSC network and the P&C Working Group to come to a final version. We have been actively engaged and providing alternative language relating to these fundamental issues - which we believe are important differentiators for the FSC and add value to the FSC brand - in the FSC revision process but unfortunately find that they have not yet been adequately addressed. In our view a "NO" vote is equivalent to a "NOT YET" vote that will give the FSC more time to resolve these outstanding issues now. We believe a continuation of the "focus group" approach to key issues that was used at the GA 2010 would be a good way forward for a speedy resolution. A "yes" vote, however, will lock-in and compound these problems for many years to come. For these reasons we encourage the FSC membership to vote "NO" on the proposed revision of the FSC P&C.

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