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## FSC Plantations Review: Raising the Bar or Lowering Standards?

In November 2002, Forest Stewardship Council's General Assembly passed a motion requiring FSC to revise its plantation policy. At the time, an area of 3.3 million hectares of plantations had been certified as well managed under the FSC system.

Almost two years later, FSC launched a Plantations Review at a meeting in Bonn, Germany. By then, the area of FSC certified plantations had increased to 4.9 million hectares.

The Plantations Review consists of two phases: a Policy Phase and a Technical Phase. The Policy Phase is currently drawing to a close. At its fourth meeting in April 2006, the Policy Working Group produced a set of "Draft Recommendations". The area of FSC certified plantations has now reached 7.4 million hectares.

Since November 2002 and the General Assembly motion, FSC has certified an additional 4.1 million hectares. It did so using a draft plantation policy which is "not clear enough and needs improvement", in the words of the motion passed by FSC's members.

At its fourth meeting the Policy Working Group produced a vision of what it would like FSC to achieve in the next ten years. The Working Group describes this vision as "Raising the Bar", implying that as a result of the Plantations Review process FSC's standards will be improved. But the vision and the Working Group's recommendations suggest that little will change for local people affected by industrial tree plantations.

The Working Group suggests that FSC should introduce a "Social Management System" for forest and plantation managers to use "to address social issues in forest and plantation management, which certification bodies would then be able to audit". This proposal overlooks the fact that local communities are sometimes in direct opposition to plantation managers. In some cases, it can be extremely dangerous for them to speak out against plantation companies. To suggest that the plantation managers simply need to refer to a Social Management System is ludicrous.

According to the Working Group, plantation managers are to be responsible for "consultation". FSC's Certifying Bodies are supposed to be able "to determine if consent has been 'manufactured'" and whether "the manager's research into the local community has identified all affected parties". But plantation managers have little interest in uncovering problems with their plantation operations. Meanwhile, determining whether all affected parties have been identified and whether consent has been manufactured could require months and years of study - certainly longer than the few days that FSC's Certifying Bodies spend assessing plantation operations.

Currently if a plantation manager has cleared forest in order to establish plantations since November 1994, then that operation cannot be certified under FSC. There are problems with this, since it does not exclude certification of plantations established since 1994 on grasslands, for example. Raising the bar might include, for example, prohibiting the conversion of grasslands and other ecosystems to plantations.

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The Working Group suggests another review to look at conversion, which will consider other ecosystems. However, the Working Group suggests that the review should reconsider the 1994 cut-off date, partly on the grounds that the current system "may exclude responsible managers who had never heard of FSC in 1994 and converted from natural forest to plantation in good faith, but who are now locked out of the certification process."

At the 2004 meeting to launch FSC's Plantations Review, one of the people who questioned the 1994 cut-off date was Arian Ardie, director for sustainability at Asia Pulp and Paper. Obviously APP has an interest in changing this cut-off date. Over the past five years, APP has been responsible for clearing about 450,000 hectares of forest to feed its Indah Kiat pulp mill in Riau, according to WWF Indonesia's Nazir Foad. But in the bizarre world of FSC, APP is a stakeholder, whose views need to be taken into account.

Back in July 2002, Tim Synnott, then FSC's Policy Director, wrote: "FSC P&C [Principles and Criteria] and guidelines are not always clear or precise, leading to different and contradictory interpretations by assessors, managers and FSC members". Four years later the Working Group has not clarified the situation. Instead, in the report of its fourth meeting, the Group states that, "the lack of confidence in FSC certification of plantations, is not because of the structure, nor the content of the P&Cs." The Working Group suggests leaving any changes to the Principles and Criteria to a separate review process.

FSC's Criterion 6.3 states that: "Ecological functions and values shall be maintained intact, enhanced, or restored, including: a) Forest regeneration and succession. b) Genetic, species, and ecosystem diversity. c) Natural cycles that affect the productivity of the forest ecosystem." This Criterion should exclude all industrial tree plantations from FSC certification.

But rather than recommending that FSC's Certifying Bodies should apply this Criterion rigorously, as it is written, the Working Group proposes that it should be interpreted as follows: "An FSC certified plantation will take an active approach to optimising its conservation strategy." This amounts to a serious weakening of the Criterion.

In its vision for FSC, the Working Group hopes to see a "significant demand for certified forest products" within ten years. In the context of a Plantations Review this is an extraordinary statement. Many industrial tree plantations provide raw material for the pulp and paper industry. The Working Group is therefore hoping for a "significant demand" for paper products. This undermines both local struggles against industrial tree plantations and NGO campaigns in the North aimed at reducing the consumption of paper.

Instead of excluding industrial tree plantations from the FSC system, the Working Group is making it easier for such plantations to be certified. The Working Group is not raising the bar, it is lowering standards. In fact it has to do so, if FSC is to stand a chance of meeting the "significant demand for certified products" hoped for in the Policy Working Group's vision for FSC.

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FSC is inviting comments on the Policy Working Group's "Draft Recommendations": [http://www.fsc.org/plantations/public\\_consultation](http://www.fsc.org/plantations/public_consultation).

