

Forest Stewardship Council (FSC): Misleading consumers about paper products

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Established in 1993 by NGOs and the timber industry, the Forest Stewardship Council is supposed to guarantee that products carrying its logo come from forestry operations that are “well managed”. FSC does not carry out the assessments itself, but has accredited a series of certifying bodies carry out assessments to determine whether the forestry operations comply to FSC's Principles and Criteria.

While it sounds like a good idea, FSC is riddled with problems. The certifying bodies interpret FSC's standards loosely, leading to the certification of operations that are blatantly in breach of FSC's Principles and Criteria. FSC certification is not only based on the Principles and Criteria, but on a bewildering array of policies, standards, advice notes, procedures and guidelines. These cover subjects such as accreditation, chain of custody, controlled wood, use of the FSC trademark, genetically modified organisms and high conservation value forests.¹ Currently FSC is carrying out several policy reviews, on plantations, principles and criteria, standard development, pesticides, governance and chain of custody.² The most common response to criticisms of FSC is that a review is currently underway, with a promise that the critique will be taken into account. Whether these promises are actually met is open to debate. In some cases, the review makes the situation worse, rather than better.³

FSC is supposed to reassure consumers that products carrying the FSC logo come from well managed sources. But FSC's labels include one called “mixed sources”. A product carrying the “mixed sources” label can contain as little as 10 per cent FSC certified material, the rest coming from “controlled sources”. But the “control” of the controlled sources is carried out by the companies themselves, thus introducing a large element of self-regulation by the industry that FSC is supposed to be regulating.

“To ensure its independence it does not accept funding from industry,” stated FSC's website in October 2003.⁴ FSC has since cast off any such reservations⁵

1 FSC's documents are available on the FSC website: [http://www.fsc.org/36.html?&no_cache=1&tx_damdownloads_pi1\[cat\]=35](http://www.fsc.org/36.html?&no_cache=1&tx_damdownloads_pi1[cat]=35)

2 FSC lists its on-going policy review and development processes on its website: <http://www.fsc.org/current-consultations.html>

3 In November 2006, Simon Counsell, Hermann Edelmann and I set up FSC-Watch, a website aimed at documenting some of the controversies raised by FSC certification. See <http://www.fsc-watch.org>.

4 “Who are we?” FSC website accessed 27 October 2003 . http://www.fsc.org/html/who_are_we.html

5 Actually a motion passed eleven months previously, at the 2002 General Assembly allows FSC to accept money from private and public companies “as long as no restrictions are attached which would affect the independence or integrity of FSC”.

“Final Motions and Results from the FSC General Assembly 2002”, FSC, 2002. <http://www.fsc.org/fileadmin/web->

and is getting increasingly cosy with the timber industry, in particular the pulp and paper industry. Each year, FSC holds a “Global Paper Forum” which brings industry representatives, NGOs and FSC staff together to find “Market opportunities for FSC-labelled paper”. This year the Forum was sponsored by Mondi and Suzano.⁶ Sponsors of FSC's 2008 General Assembly include pulp and paper companies Mondi, Tembec and Sveaskog.⁷

One of the most serious problems with the Forest Stewardship Council is the fact that it promotes consumption. Paper produced from eucalyptus monocultures is marketed with the FSC's logo. Consumers are tricked into believing that this is “environmentally friendly” paper. As Simon Counsell, the UK Director of the Rainforest Foundation, pointed out in an interview with *Ethical Consumer* magazine,

“The vast majority of what we import into this country [UK] is from North America and Scandinavia and it's not timber it's pulp and paper. This shows that most importantly we need to reduce consumption. We need much, much more recycling and reuse. One problem is that the increasing amount of FSC certified paper and toilet tissue is undermining efforts to sell more recycled paper, because people see it and think. it's a green product so it's OK. Actually it's not, and it may be from oldgrowth logging in Ontario or Northern Russia, and it's damaging recycling markets.”⁸

This criticism is not new. In September 1993, before FSC's founding assembly, German NGO Rettet den Regenwald produced a report criticising the proposal to establish FSC. “At best the FSC initiative is naive,” wrote Rettet den Regenwald, “at worst it provides a framework for the timber industry to achieve a much desired ‘green veneer’ and defuse pressure to attack the real issues of illegal trade, indigenous people's rights and over-consumption.”⁹

FSC's certifying bodies exercise a large degree of control over the way the organisation functions. One of FSC's certifying bodies, SGS, is also sponsoring the General Assembly. SGS will be sponsoring the General Assembly while under a self-imposed “moratorium” on new FSC assessments. On 29 May 2008, after a series of controversial certificates, SGS imposed the “moratorium”, which FSC misleadingly announced on its website as a moratorium on issuing new certificates. In fact, SGS continued to issue certificates, issuing 15 in the three months after announcing the

data/public/document_center/general_assembly_documents/FSC_General_Assembly_2002_Final_Motions.pdf

6 See <http://www.writingthefuture.org>

7 “Support the FSC General Assembly 2008”, Forest Stewardship Council. <http://www.fsc.org/gasupport.html>

8 “Forest Stewardship Council – Seeing the Wood for the Trees”, *Ethical Consumer*, Issue 100, January/February 2008. http://www.fsc-watch.org/archives/2008/02/01/FSC_acknowledges_sys

9 “The Forest Stewardship Council Aims Principles and Criteria: A Critical Examination Predicting its Failure”, Rettet den Regenwald, 30 September 1993, cited in Timothy Synnott (2005) “Some notes on the early years of FSC”, 19 November 2005, page 22. http://www.fsc.org/fileadmin/web-data/public/document_center/publications/Notes_on_the_early_years_of_FSC_by_Tim_Synnott.pdf

Of course, parts of the timber industry were also opposed to the establishment of FSC. In 1992, Terence Mallinson, director of the UK timber industry Forests Forever campaign, wrote twice to the Oxford Forestry Institute stating that FSC “could rebound on us all” and “We do not approve of the FSC and its charter, since it is clearly in breach of sovereignty and defies any current or proposed forest management programmes”. Cited in Timothy Synnott (2005) “Some notes on the early years of FSC”, 19 November 2005, page 37. http://www.fsc.org/fileadmin/web-data/public/document_center/publications/Notes_on_the_early_years_of_FSC_by_Tim_Synnott.pdf

“moratorium”.¹⁰ FSC declined to answer my questions about the “moratorium”.¹¹

Equally disturbing is the relationship between the certifying bodies and the companies being assessed. Companies hire the certifying bodies directly. As such, the certifying bodies compete against each other for business. Clearly, any commercial timber company is far less likely to hire a certifying body that interprets FSC's Principles and Criteria strictly and gets a reputation for being “difficult” than a certifying body that rubber stamps operations as well managed after a cursory inspection.

“One of the things I've been saying for five years,” Simon Counsell explains, “is that you've got to remove the major conflict of interest at the core of the organisation, which is that the certifying companies contract directly with the companies that they're supposed to be independently monitoring.” Counsell recommends a system where companies would contact the FSC and certifiers would then apply for the contract. “They would have to demonstrate that they've got the expertise, that they'd spend enough time in the field to carry out proper assessments and would comply rigorously with the FSC's requirements. It would become in their interests to keep the FSC happy rather than to keep the logging companies happy.”¹²

Rather than addressing the structural problem, FSC created a body called Accreditation Services International (ASI) to monitor its certifying bodies. ASI carries out audits of the certifying bodies and publishes the reports on its website.¹³ These reports often reveal serious problems, but ASI is slow to take meaningful action against its certifying bodies. In Uganda, for example, ASI found that SGS had issued a certificate to the Ugandan Wildlife Authority (UWA) for Mount Elgon National Park based on hoped for future improvements, rather than what was actually happening in the national park. In February 2008, UWA evicted more than 4,000 people, including Indigenous Peoples, from the national park. Other ASI audits of SGS found similar problems, in Russia, Poland, Guyana and Spain.¹⁴

Timothy Synnott, FSC's executive director from 1994 to 2002 notes that

10 According to a search for SGS-issued certificates on <http://www.fsc-info.org>. When I asked about this, SGS's Gerrit Marais told me that “The moratorium came into place on 29th May 2008, however at this point, SGS obviously had already signed contracts for certification services which have to be concluded and it stands to reason that certificates would still be issued post this date.” (Email from Gerrit Marais to Chris Lang “FW: Information Request – FSC-Watch”, 3 September 2008.)

11 I wrote to Patricia Dudeck in FSC's Communications Department on 3 September 2008. FSC's announcement of the moratorium stated “For further information, please contact the FSC Communications Program at p.dudeck@fsc.org.” The contact address has since been changed to communications@fsc.org. “SGS moratorium on new FSC forest management certificates”, FSC website, 4 July 2008. [http://www.fsc.org/news.html?&tx_ttnews\[backPid\]=86&tx_ttnews\[cat\]=1&tx_ttnews\[tt_news\]=31&cHash=467d8d9723](http://www.fsc.org/news.html?&tx_ttnews[backPid]=86&tx_ttnews[cat]=1&tx_ttnews[tt_news]=31&cHash=467d8d9723)

12 “Forest Stewardship Council – Seeing the Wood for the Trees”, *Ethical Consumer*, Issue 100, January/February 2008. http://www.fsc-watch.org/archives/2008/02/01/FSC_acknowledges_sys

13 Accreditation Services International <http://www.accreditation-services.com/>

14 “Accreditation Services International: A watchdog with neither bark nor bite”, FSC-Watch. http://www.fsc-watch.org/archives/2008/02/12/Accreditation_Servic

Chris Lang (2008) “Uganda: Thousands of Indigenous People evicted from FSC-certified Mount Elgon National Park”, World Rainforest Movement Bulletin 131, June 2008. <http://chrislang.org/2008/06/27/uganda-thousands-of-indigenous-people-evicted-from-fsc-certified-mount-elgon-national-park/>

“The work of the FSC has been described as an example of 'Consumer Democracy' by Monbiot (2003, p. 59), 'enabling the consumer to make an informed choice'. When the 'informed choice' to buy certified forest products is made by large number of governments, organizations and companies, the impact can be very great.”¹⁵

This is, unfortunately, typical of the cherry picking that FSC proponents use to promote FSC certification. In his 2003 book “The Age of Consent”, George Monbiot discusses the limits of what he calls “consumer democracy”. He notes that “mindful consumption is a weak and diffuse means of changing the world, and it has been greatly overemphasized by those . . . who wish to avoid the necessary political conflicts.”¹⁶

FSC and plantations

In his notes about the first years of FSC, Timothy Synnott explains that one of the reasons he became involved with FSC was that he “had grown disillusioned . . . about plantations, where the trend towards monocultures and chemical-dependence continued unabated”.¹⁷ Synnott writes that “FSC and certification seemed to be what was needed for a major shake-up.”

Synnott notes the “rapid spread of industrial tree plantations, often at the expense of natural forests and other natural habitats.”¹⁸ He notes that people living near plantations “objected to the march of alien-looking plantations, but they were easily brushed aside as being against the march of progress and the national interest.”¹⁹

Today, FSC has certified a large area of monoculture, chemical-dependent industrial tree plantations. The exact area is impossible to determine, however, because FSC does not provide information about the exact area of plantations that it has certified. It classifies its certified areas as “Natural” (55.25%), “Semi-Natural and Mixed Plantation and Natural Forest” (36.41%) and Plantations (8.33%).²⁰

At FSC's Founding Assembly, in October 1993, FSC had two sets of Principles

15 Timothy Synnott (2005) “Some notes on the early years of FSC”, 19 November 2005, page 50.
http://www.fsc.org/fileadmin/web-data/public/document_center/publications/Notes_on_the_early_years_of_FSC_by_Tim_Synnott.pdf

16 George Monbiot (2003) “The Age of Consent: A manifesto for a new world order”, Flamingo, page 56.

17 Timothy Synnott (2005) “Some notes on the early years of FSC”, 19 November 2005, page 3.
http://www.fsc.org/fileadmin/web-data/public/document_center/publications/Notes_on_the_early_years_of_FSC_by_Tim_Synnott.pdf

18 Timothy Synnott (2005) “Some notes on the early years of FSC”, 19 November 2005, page 4.
http://www.fsc.org/fileadmin/web-data/public/document_center/publications/Notes_on_the_early_years_of_FSC_by_Tim_Synnott.pdf

19 Timothy Synnott (2005) “Some notes on the early years of FSC”, 19 November 2005, page 4.
http://www.fsc.org/fileadmin/web-data/public/document_center/publications/Notes_on_the_early_years_of_FSC_by_Tim_Synnott.pdf

20 FSC (2008) “Global FSC certificates: type and distribution”, FSC Presentation, 17 April 2008.
http://www.fsc.org/fileadmin/web-data/public/document_center/powerpoints_graphs/facts_figures/08-04-01_Global_FSC_certificates_-_type_and_distribution_-_FINAL.pdf

and Criteria. One set applied to forests and one to plantations.²¹ Both sets had nine principles. The plantations set was dropped, and reintroduced as Principle 10 in 1996.

FSC's Principle 10 states that "Plantations shall be planned and managed in accordance with Principles and Criteria 1 - 9, and Principle 10 and its Criteria." In other words, the plantation itself must be managed to comply to all of FSC's Principles and Criteria. There is nothing in the Principles and Criteria which would allow certifying bodies to issue certificates to companies that attempt to "offset" an area of monoculture plantations with an area of protected forest.²²

Several of FSC's Principles and Criteria should rule out the certification of industrial tree plantations.²³ Criterion 1.6, for example, states that "Forest managers shall demonstrate a long-term commitment to adhere to the FSC Principles and Criteria." In practice, companies can get away with a public statement stating that they adhere to FSC's Principles and Criteria, regardless of the reality. Pulp and paper companies that produce raw material in large scale monocultures cannot demonstrate commitment to all of FSC Principles and Criteria.

Principle 2 relates to "Tenure and use rights and responsibilities" and states that "Long-term tenure and use rights to the land and forest resources shall be clearly defined, documented and legally established." One of the problems with the certification of industrial tree plantations is that disputes over tenure and use rights take place when the plantations are established. By the time the plantation is assessed for certification, the people who lost their land and livelihoods have often long since moved away from the plantation area. To uncover their stories would involve in-depth research in the slum areas of nearby towns - research which is beyond the capacity of certifying bodies.

Criterion 5.4 states that "Forest management should strive to strengthen and diversify the local economy, avoiding dependence on a single forest product." Monoculture tree plantations which produce only raw material for the pulp and paper industry clearly do not strengthen or diversify the local economy. In fact, they do the reverse. They make the local economy heavily dependent on a single company which is in turn dependent on one single product: wood as raw material for pulp production.²⁴

21 Timothy Synnott (2005) "Some notes on the early years of FSC", 19 November 2005, page 19.
[http://www.fsc.org/fileadmin/web-](http://www.fsc.org/fileadmin/web-data/public/document_center/publications/Notes_on_the_early_years_of_FSC_by_Tim_Synnott.pdf)

22 This point was raised with FSC in 2002, by IMO, one of FSC's certifying bodies. Six years later it remains true, although this may be about to change, as a result of FSC's Plantations Review, which started in 2004. Wolfram Kotzurek, Karl Büchel and Thomas Papp-Váry (2002) "Requirements for certified plantations. Interpretation of FSC - P&C", Institut für Marktölogy forestry division.

23 This critique is based in part on the following:
"Comments on the FSC's Principle on Plantations", World Rainforest Movement Bulletin, Special Issue on FSC certification of plantations, February 2001. <http://www.wrm.org.uy/bulletin/FSC.html#10>
"Certifying the Uncertifiable: FSC Certification of Tree Plantations in Thailand and Brazil", World Rainforest Movement, August 2003. <http://www.wrm.org.uy/actors/FSC/uncertifiable.html>

24 This point was raised with FSC in 2002, by IMO, one of FSC's certifying bodies. Six years later it remains true. Wolfram Kotzurek, Karl Büchel and Thomas Papp-Váry (2002) "Requirements for certified plantations. Interpretation of FSC - P&C", Institut für Marktölogy forestry division.

It is difficult to imagine how any industrial tree plantation could comply with Principle 6. It states: "Forest management shall conserve biological diversity and its associated values, water resources, soils, and unique and fragile ecosystems and landscapes, and, by so doing, maintain the ecological functions and the integrity of the forest." Industrial tree plantations destroy biodiversity, impact water resources and soils, and are monocultures which replace native ecosystems. Plantation management is an artificial system which has little or nothing to do with the ecological functions and integrity of the forest.

Criterion 6.3 alone should exclude the certification of all monoculture tree plantations: "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." Industrial tree plantations replace ecological functions with a monoculture, which is harvested in clearcuts and replanted. No forest regeneration or succession takes place in an industrial tree plantation. Diversity is deliberately limited. Natural cycles have little or nothing to do with the productivity of industrial tree plantations.²⁵

Criterion 6.6 deals with the use of chemicals: "Management systems shall promote the development and adoption of environmentally friendly non-chemical methods of pest management and strive to avoid the use of chemical pesticides." Industrial tree plantations are at severe risk from pest and disease. While management may "strive to avoid" (whatever that means in the context of tens of thousands of hectares of monoculture) using chemical pesticides, the reality is that plantation managers are dependent on pesticides, fungicides and herbicides to prevent and control outbreaks of pests and diseases. Plantation managers often also rely on chemical fertilizer to achieve faster growth rates.

FSC's position on genetically modified trees is confusing. Criterion 6.8 is clear: "Use of genetically modified organisms shall be prohibited." But as with many of FSC's standards, the problem is in the implementation of the Criterion. Can an FSC certified company carry out laboratory research into GE trees? Can it carry out field trials in areas that are not certified? Can it finance research into GE trees by universities or other research institutions? In October 2007, the US-based Stop GE Trees campaign wrote to Heiko Liedeker, FSC's then-director, with copies to all Board members, requesting clarification on these questions. FSC declined to reply.²⁶

Criterion 6.9 is almost completely meaningless in the context of large-scale industrial tree plantations planted with exotic species: "The use of exotic species shall be carefully controlled and actively monitored to avoid adverse ecological impacts." In order to certify industrial tree plantations, FSC is saying that a plantation company that plants millions of exotic trees (which

25 This point was raised with FSC in 2002, by IMO, one of FSC's certifying bodies. Six years later it remains true. Wolfram Kotzurek, Karl Büchel and Thomas Papp-Váry (2002) "Requirements for certified plantations. Interpretation of FSC – P&C", Institut für Marktölogy forestry division.

26 "Stop GE Trees Campaign seeks clarification of FSC's position on GM trees", FSC-Watch, 12 October 2008. http://www.fsc-watch.org/archives/2007/10/12/Stop_GE_Trees_Campaign_seeks_clarification_of_FSC_s_position_on_GM_trees

may become weedy and spread into natural ecosystems, as is the case with eucalyptus, pine and acacia plantations in South Africa, for example) is actually “carefully controlling” the use of exotic species. Clearly, this is nonsense. Any company “actively monitoring” its plantations would immediately realise that its monocultures have created adverse ecological impacts.

Principle 10 is a strange mixture of statements. On the one hand, parts of Principle 10 sound similar to the propaganda produced by plantation proponents. On the other hand, Principle 10 includes several criteria which are apparently aimed at excluding industrial tree plantations from FSC certification (although the wording used is so weak that it is wide open to interpretation by the certifying bodies).

Principle 10 includes the following statement:

“While plantations can provide an array of social and economic benefits, and can contribute to satisfying the world's needs for forest products, they should complement the management of, reduce pressures on, and promote the restoration and conservation of natural forests.”

This is not a principle against which plantation management can be judged, it is the sort of wishful thinking produced by the pulp and paper industry. The language does not lend itself to precise interpretation. Instead of saying that plantations *shall* provide social and economic benefits and reduce pressure on forests, it says that they *can* and *should* do so respectively. An industrial tree plantation established to provide raw material for a pulp mill, explicitly does not provide social and environmental benefits. Proving that a particular plantation reduces pressure on forests would be difficult, if not impossible. It would involve taking into account the activities of all the people who have moved away from the area of the plantations because of the impact on their livelihoods. In many cases, they have little choice other than to clear areas of forest elsewhere to grow food. Neither do plantations “promote the restoration and conservation of natural forests”, on the contrary, plantations often replace natural forest. In its 2003 report on “Fastwood” plantations, CIFOR notes that “there is little evidence to suggest that fast wood plantations have taken pressure off natural forests”.²⁷

FSC displays a bias in favour of companies and against local people in Principle 10, with the mention of “the world's needs for forest products”. As the pulp industry relocates to the global South, local people are increasingly being forced off their land to make way for industrial tree plantations that provide raw material to meet “the world's needs”. But the pulp is often exported from the country in which it is produced. Paper consumption in the North is way higher than in the South. FSC's Principle 10 assumes that consumers in the North need paper more than local people in the South need land.

Criterion 10.1 appears to commit plantation managers to restoration of native

²⁷ Christian Cossalter and Charlie Pye-Smith (2003) “Fast-Wood Forestry. Myths and Realities”, Center for International Forestry Research (CIFOR), Bogor, Indonesia, page 44.
<http://assets.panda.org/downloads/fastwood.pdf>

forest: “The management objectives of the plantation, including natural forest conservation and restoration objectives, shall be explicitly stated in the management plan, and clearly demonstrated in the implementation of the plan.” As WRM pointed out in its critique of Principle 10, written in 2001, “management objectives of industrial plantations are always explicitly stated: the production of large quantities of timber in the shortest time possible”.²⁸ This has nothing to do with restoring forest.

Criterion 10.3 states that “Diversity in the composition of plantations is preferred, so as to enhance economic, ecological and social stability. Such diversity may include the size and spatial distribution of management units within the landscape, number and genetic composition of species, age classes and structures.” This should exclude the certification of monoculture tree plantations. But what do the words “is preferred” mean in this context? Could this criterion be met, as WRM suggests in its critique of Principle 10, simply by planting two species of eucalyptus over a huge area and planting two areas a couple of years apart? Apparently so, judging from some of the certificates of industrial tree plantations that FSC's certifying bodies have issued.

Criterion 10.4 contradicts itself. It starts by stating that “The selection of species for planting shall be based on their overall suitability for the site and their appropriateness to the management objectives.” A pulp company, in, say, Brazil, will have no problem complying with this. There is a large market for eucalyptus pulp. Scientists have carried out decades of research into fast-growing eucalyptus species and matching these species to soil types and climate types. Planting eucalyptus is entirely appropriate to the company's management objectives: to produce pulp. No problem there, then.

But the next sentence puts the pulp company in difficulty, at least if it wants to comply with FSC's standards: “In order to enhance the conservation of biological diversity, native species are preferred over exotic species in the establishment of plantations and the restoration of degraded ecosystems.” It seems that in order to qualify for FSC certification, the pulp company will have to relocate to Australia, at least if it wants to plant eucalyptus. Fortunately, for Australia, there's a loophole large enough to accommodate a US\$1.5 billion pulp project anywhere in the world. Once again, Principle 10 uses the word “preferred”. The Criterion states only that “native species *are preferred* over exotic species”, not that exotic species shall not be used. So the pulp company can remain in Brazil, establish vast areas of exotic eucalyptus monocultures, and get FSC certification after all.

The final sentence of Criterion 10.4 confirms that the pulp company need not worry about its eucalyptus monocultures: “Exotic species, which shall be used only when their performance is greater than that of native species, shall be carefully monitored to detect unusual mortality, disease, or insect outbreaks and adverse ecological impacts.” Pulp companies plant exotic eucalyptus trees precisely because their performance is better for pulp production (or at least better researched) than native species. Eucalyptus pulp commands a higher price on the world market than pulp manufactured from native forests. Little

²⁸ “Comments on the FSC's Principle on Plantations”, World Rainforest Movement Bulletin, Special Issue on FSC certification of plantations, February 2001. <http://www.wrm.org.uy/bulletin/FSC.html#10>

is known about the growth rates of many of, say, Brazil's tree species, and even less is known about their qualities for producing pulp. Monitoring for “unusual mortality, disease, or insect outbreaks” is business-as-usual for any company that has invested millions of dollars in an exotic monoculture plantation.

Monitoring for “adverse ecological impacts” is another matter. Replacing a natural ecosystem with a monoculture of thousands of hectares of exotic species is in itself an “adverse ecological impact”. The problem is that the impacts, such as reduced water supply as the monocultures suck streams and ponds dry, is felt by local communities and not by the scientists that the company employs to monitor its plantations. When FSC's certifying bodies visit the plantations they listen to the company's scientists rather than the local communities.

Criterion 10.5 is hopelessly vague: “A proportion of the overall forest management area, appropriate to the scale of the plantation and to be determined in regional standards, shall be managed so as to restore the site to a natural forest cover.” Once again this leads to a string of questions. What percentage of the management area shall be restored to forest? Is one per cent sufficient? Or 10 per cent? Or 50 per cent? What if the area never had forest cover, in countries such as Uruguay, Argentina or South Africa, where large areas of plantations have been FSC-certified?

Criterion 10.6, if applied consistently, would exclude all large scale, fast growth, exotic tree plantations from FSC certification. It states that

“Measures shall be taken to maintain or improve soil structure, fertility, and biological activity. The techniques and rate of harvesting, road and trail construction and maintenance, and the choice of species shall not result in long-term soil degradation or adverse impacts on water quality, quantity or substantial deviation from stream course drainage patterns.”

Yet FSC has certified large scale plantations with serious impacts on soil structure, fertility, biological activity and water. FSC-certified plantations in South Africa, Brazil, Chile and Uruguay are harvested in large clearcuts, leaving the soil exposed.

Criterion 10.7 states that “Measures shall be taken to prevent and minimize outbreaks of pests, diseases, fire and invasive plant introductions.” FSC does not specify the measures that companies are supposed to take. Year after year, thousands of hectares of FSC-certified plantations in South Africa burn. FSC-certified companies kill baboons, which have become a pest in plantations.²⁹ Obviously this slaughter has an impact on local biodiversity. Meanwhile the plantation companies' exotic trees have turned into invasive species in native ecosystems. None of the plantation companies have lost their FSC certificates as a result.

Principle 10.8 should prevent the certification of industrial tree plantations:

²⁹ “Wildlife slaughter and fires take corporate gloss off FSC General Assembly”, FSC-Watch, 4 September 2008. http://www.fsc-watch.org/archives/2008/09/04/Wildlife_slaughter_a

“Appropriate to the scale and diversity of the operation, monitoring of plantations shall include regular assessment of potential on-site and off-site ecological and social impacts, (e.g. natural regeneration, effects on water resources and soil fertility, and impacts on local welfare and social well-being), in addition to those elements addressed in principles 8, 6 and 4. No species should be planted on a large scale until local trials and/or experience have shown that they are ecologically well-adapted to the site, are not invasive, and do not have significant negative ecological impacts on other ecosystems. Special attention will be paid to social issues of land acquisition for plantations, especially the protection of local rights of ownership, use or access.”

But what does monitoring “appropriate to the scale and diversity of the operation” actually involve in practice? This is wide open to interpretation. Any plantation company is likely to carry out trials before investing in large scale plantations. But the trials are invariably small scale and, as WRM pointed out in 2001, “the only effective test of the social and environmental effects of large-scale plantations are large-scale plantations themselves”. WRM proposed that “The criterion should therefore be revised to specify that no plantations will be certified in areas where there is enough evidence of substantial negative impacts (social, environmental or both) caused by existing large-scale plantations.”³⁰

The final sentence of Criterion 10.8 is also problematic. What does “special attention” to social issues of land acquisition actually mean? If any local right has been violated, does this mean that an FSC certificate will never be issued? Clearly not, given the certificates that have been issued. So what, exactly, does this sentence mean in practice?

Criterion 10.9 states that

“Plantations established in areas converted from natural forests after November 1994 normally shall not qualify for certification. Certification may be allowed in circumstances where sufficient evidence is submitted to the certification body that the manager/owner is not responsible directly or indirectly of such conversion.”

Once again, this raises several questions. What does the word “normally” mean in the first sentence? How does FSC define “sufficient evidence”? What happens if a company buys a plantation operation after 1994, from a company that cleared forest to make way for the plantations? Can the company that bought the plantation be certified? How much investigation do certifying bodies have to carry out into allegations that companies hired local people to clear forests?

Clearly there are several serious problems with the FSC-certification of industrial tree plantations. By certifying large areas of monocultures, FSC is undermining its own legitimacy.

³⁰ “Comments on the FSC’s Principle on Plantations”, World Rainforest Movement Bulletin, Special Issue on FSC certification of plantations, February 2001. <http://www.wrm.org.uy/bulletin/FSC.html#10>

Plantations review

FSC is well aware of the problems with the certification of plantations. In 2001, FSC's secretariat included the organisation's position on plantations in a list of issues needing clarification. Subsequently, Tim Synnott, then-FSC's Policy Director, wrote a draft FSC Plantation Policy. Synnott's draft paper acknowledged that "Disputes have arisen around plantation certification, with reports of infraction of FSC guidelines. Some of the disagreements and disputes have been caused by different interpretations of the FSC Principles and Criteria and other policies."³¹

At FSC's General Assembly in 2002, a motion was passed for FSC to carry out a "Plantations Review". The motion stated that "The current version of the FSC Plantation Policy Draft (30 May 2002) is not clear enough and needs improvement." The motion continued to state that FSC should produce a revised plantation policy "after a broad consultation with the membership" to give "concrete guidance on the interpretation of P10 [Principle 10]". This was supposed to take place within 18 months of the motion (i.e. by May 2004).³² But almost six years after passing this motion, FSC has still not produced a revised plantation policy.

At the 2002 FSC General Assembly, members passed another motion for a review of FSC's chain of custody. This also had an 18 month deadline. The review involved creating a new label for "mixed sources", effectively making it very much easier for paper companies to put FSC's logo on their products. FSC used "mainly core funding" to carry out this review, according to Sofia Ryder, who worked in FSC's policy and standards unit at the time.^{33 34}

When it came to the Plantations Review, no funding was available.

In November 2003, a year after the motion was passed, FSC had made little or no progress towards carrying out a Plantations Review. Nevertheless, FSC produced a two page information leaflet titled "Forest Plantations". The leaflet

31 Timothy Synnott (2002) "Review of FSC Plantation Policies: An FSC discussion paper. Clarification of FSC's position on plantations", Forest Stewardship Council, Draft, revised 18 July 2002. [http://www.old.fsc.org/plantations/docs/Resources%20-%20FSC%20docs%20and%20reports/FSC-DIS-30-001%20FSC%20Plantation%20Policies_draft%20\(2002\).pdf](http://www.old.fsc.org/plantations/docs/Resources%20-%20FSC%20docs%20and%20reports/FSC-DIS-30-001%20FSC%20Plantation%20Policies_draft%20(2002).pdf)

32 "Final Motions and Results from the FSC General Assembly 2002", FSC, 2002. http://www.fsc.org/fileadmin/web-data/public/document_center/general_assembly_documents/FSC_General_Assembly_2002_Final_Motions.pdf

33 "Presentation by Sofia Ryder, FSC at Forest Movement Europe meeting", 24 April 2004, Helsinki.

34 It is worth noting where the use of "percentage based claims" (which later became the "mixed sources" label) within the FSC system comes from. In September 1995, FSC's executive director, Tim Synnott, visited the Caperboard factory in Scotland. Here's his account of the visit:

"The manager explained that his raw materials came from hundreds of municipal and industrial recycling schemes, from thinning operations in thousands of different properties, and waste from countless sawmills, all derived from a long list of forests that varied every year. He recognized the public concerns about forest management quality, and also the right of industries to seek evidence of good management, but he knew that several years would pass before most of these forest properties would be certified. He was willing to start down this road, but only if he could get some recognition for the progress made towards fully certified raw materials, while continuing to use some raw materials from uncertified forests. After this visit, a policy for Percentage-Based Claims was a priority, that came into operation two years later." Timothy Synnott (2005) "Some notes on the early years of FSC", 19 November 2005, page 39. http://www.fsc.org/fileadmin/web-data/public/document_center/publications/Notes_on_the_early_years_of_FSC_by_Tim_Synnott.pdf

explains that FSC defines forest as “a tract of land dominated by trees”. According to FSC, plantations are “forest areas lacking most of the principal characteristics and key elements of native ecosystems, which result from the human activities of planting, sowing or intensive silvicultural treatments.” As such, “Plantations are included in the FSC definition of forests”. Clearly, FSC was not going to consider too radical an approach to its Plantations Review, the outcome of which might include, for example, a definition of plantations making clear that they are not forests.

By April 2004, FSC had, at last, started fundraising to carry out the Plantations Review. Two meetings were held, one in Brazil and one in South Africa. “We're just trying to understand what are the issues, and that will help us to put together the scope of what the review has to be,” explained Sofia Ryder in April 2004.³⁵ Two of the environmental organisations that took part in the meeting in Brazil had very close links to FSC-certified companies. Others, who are highly critical of FSC certification of plantations, were not at the meeting.

When a motion is passed at the General Assembly, there is no mechanism within FSC to ensure that the Secretariat carries out that motion. At the time, the Policy and Standards Unit in the FSC Secretariat consisted of two people. A motion to carry out a chain of custody review, which relaxed FSC's standards and created a new label for the benefit of the pulp and paper industry was carried out using FSC core funding. A motion to carry out a Plantations Review, which, in theory at least, might lead to a strengthening of FSC's standards did not even start for almost two years because FSC had no funding to carry out the review. The biases towards the industry within the FSC system are clear.

When the plantations review motion was passed in 2002, an area of 3.3 million hectares of plantations had been FSC-certified. That figure is now 8.6 million hectares.³⁶

The Plantations Review finally started in September 2004. The first phase of the Review was a two year “Policy Working Group”, carried out by 12 people representing each of FSC's chambers (economic, environment and social). The team consisted of 11 men and one woman. The second phase consists of four “Technical Expert Teams”, appointed by the FSC Board. These technical experts are working to “further develop the recommendations of the Policy Working Group”. Out of a total of 18 experts, only two are women.³⁷

Needless to say, the pulp and paper industry is very interested in ensuring that no meaningful reforms come from the plantations review. A Plantation Working Group meeting in South Africa was sponsored by Mondi. The visit included a two day field trip to visit Mondi's plantations. South African NGO coalition Timberwatch requested as much time as industry to present their

35 “Presentation by Sofia Ryder, FSC at Forest Movement Europe meeting”, 24 April 2004, Helsinki.

36 “Global FSC certificates: type and distribution”, FSC, 17 April 2008, page 7. http://www.fsc.org/fileadmin/web-data/public/document_center/powerpoints_graphs/facts_figures/08-04-01_Global_FSC_certificates_-_type_and_distribution_-_FINAL.pdf

37 “Expert Teams for the Technical Phase of the Plantations Review”, Forest Stewardship Council, 13 December 2007. http://www.old.fsc.org/plantations/docs/Home/2007-12-13_Expert_Teams.pdf

point of view, but this was rejected. Nevertheless, Timberwatch ensured that the Plantations Working Group saw (and heard about) some of the impacts of FSC certified plantations in South Africa.³⁸

At its fourth meeting in April 2006, the Policy Working Group produced a vision of what it would like FSC to achieve in the next ten years. The vision is titled “Raising the Bar”, implying that as a result of the Plantations Review, FSC's standards will be improved. But there is little to suggest that things will genuinely improve.

Instead of producing concrete recommendations for tightening up Principle 10 to exclude industrial tree plantations from FSC certification, the Plantations Review Policy Working Group suggests that what is required is a “new mindset and approach”. Parts of the Group's final report sound more like a manifesto for a new age society, than an attempt to regulate corporations that are producing billions of dollars of profit and creating massive environmental and social impacts. To give just one example from the final report:

“[W]e used the term highest common denominator to describe how we need to operate in the future, using conflict as a multiplier or lever for better outcomes, rather than a wedge to come between us. How else can we deliver a system that is economically viable, environmentally sustainable and socially just? Aiming for anything less than the highest common denominator will simply put us in conflict with ourselves, and we will likely all lose out.”³⁹

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 Policy Working Group had failed to clarify the situation. In its 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. This review process is underway and in April 2008, FSC's Board of Directors issued a draft revised version of FSC's Principles and Criteria.

The Board of Directors' April 2008 draft is the result of a series of motions from the 2005 General Assembly⁴⁰ and the recommendations from the

38 “Did the FSC Plantations Policy Working Group get it right?”, Timberwatch, 2006
<http://www.wrm.org.uy/countries/SouthAfrica/filedtrip.pdf>

39 “The FSC Plantations Review Policy Working Group Final Report”, Forest Stewardship Council, 20 October 2006.
[http://www.old.fsc.org/plantations/docs/Resources%20-%20FSC%20docs%20and%20reports/Final%20Plantations%20Policy%20Review%20Report%202006-10-20%20\(EN\).pdf](http://www.old.fsc.org/plantations/docs/Resources%20-%20FSC%20docs%20and%20reports/Final%20Plantations%20Policy%20Review%20Report%202006-10-20%20(EN).pdf)

40 At the 2005 General Assembly, a series of motions were raised relating to the Principles and Criteria. Instead of voting on each one separately, FSC members passed a statutory motion to set up a working group to analyse these motions and make recommendations. FSC's members were to subsequently vote on whether the working group's recommendations should be implemented or not. Instead of setting up a working group, “Given the high level of legitimacy required in this process, the Board of Directors decided as the working group for the P&C group.” (“FSC-STD-01-001 Version 5-0 Draft 1-0 EN FSC Principles and Criteria”, FSC International Center, 30 April 2008. http://www.fsc.org/fileadmin/web-data/public/document_center/international_FSC_policies/standards/FSC_STD_01_001_V4_0_EN_FSC_Principles_and_Criteria.pdf) FSC is currently requesting applications from members to join a working group to revise the Principles and Criteria.

Plantations Review (although the Technical Expert Teams have not yet finished their work).

One of the changes is to insert the words “and plantations” throughout the principles and criteria, after the word “forest”. The draft amended version of Criterion 1.1 therefore reads as follows: “Forest *and plantation* management shall respect all national and local laws and administrative requirements,” (emphasis added). This is intended “to clarify that the Principles and Criteria are applicable to all types of forest and plantations management,” according to the board of directors' notes in the revised draft.

In the draft revised version, the word “should” has been replaced with the word “shall” throughout the Principles and Criteria. This is intended to clarify that the Principles and Criteria are requirements, not recommendations.⁴¹ This is good news for those who think that FSC should not certify industrial tree plantations, because it creates the impossible-to-meet and impossible-to-prove principle that plantations “*shall* complement the management of, reduce pressures on, and promote the restoration and conservation of natural forests,” (emphasis added).

A major change suggested in the draft is to Principle 4, which is retitled “Workers' rights, social responsibility and local development”. The idea is to separate the criteria relating to each of these three issues. The revised criteria include participatory assessments, mitigation and compensation measures, adherence to ILO standards and communities are to be “identified” and consulted as well as given “opportunities for employment, training, and other services”. In addition, new criteria are proposed to give the same rights for sub-contracted workers as directly employed workers, better wages, rules on accommodation and healthcare, and mechanisms for resolving grievances.

So far so good. These changes reflect the Plantations Review Policy Working Group's intention to “[i]ntegrate, more systematically than before, social issues into FSC structures and processes”.

Other proposals are far more problematic though. The revised draft proposes deleting the words “avoiding dependence on a single forest product” from criterion 5.4. As it stands, this Criterion should (at least in theory) exclude the certification of many industrial tree plantations, which exist to produce one product, such as raw material for pulp production.

A revision to criterion 6.1 suggests that the impacts of the operation shall have been determined before activities are started. This is to include the “ecological process of nutrient, water, carbon and biological cycles”. While this may create a bonanza for forestry consultants, it is unlikely to have any beneficial impact on plantation management. I look forward to reading the assessments of how establishing a plantation on large areas of grassland in Uruguay might impact the carbon cycle, particularly when the product produced is pulp, to be shipped to China, where it will be processed into paper

41 “FSC-STD-01-001 Version 5-0 Draft 1-0 EN FSC Principles and Criteria”, FSC International Center, 30 April 2008. http://www.fsc.org/fileadmin/web-data/public/document_center/international_FSC_policies/standards/FSC_STD_01_001_V4_0_EN_FSC_Principles_and_Criteria.pdf

which will end up rotting in a landfill and emitting methane. I look forward to the companies' guesses of what might happen to the people whose livelihoods are destroyed by the plantations, including those who migrate to cities and take up a lifestyle resulting in far more carbon dioxide emissions (or less, depending on what they previously did - the point being that it is impossible to predict and even more difficult to monitor).

In at least one case, the Plantations Review Policy Working Group recommended a major weakening of FSC's standards. As noted above, FSC's Criterion 6.3 should exclude all industrial tree plantations from FSC certification. It 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."

Rather than recommending a strict interpretation of this Criterion, the Plantations Review Policy Working Group proposed that it should be interpreted as follows: "An FSC certified plantation will take an active approach to optimising its conservation strategy." There are two serious problems with this interpretation. First, it amounts to a complete re-writing of the Criterion, to the point where the words used in the Criterion no longer have any meaning. It is a dramatic weakening of the Criterion. Second, and perhaps more importantly, it suggests that an "offset" system of certification is appropriate - one where the plantation itself need not comply with all of FSC's Principles and Criteria, but by conserving forest outside the plantation the plantation manager can "offset" this non-compliance.

The Board of Directors' proposed revisions to the Principles and Criteria propose deleting criterion 6.3. Sure enough, the proposed amendments explicitly allow offsetting of the impacts of operations: "Each impact shall be linked with a description of how and where in the management unit the impact is prevented, mitigated or remedied." So, a plantation company could wipe out the biodiversity in its plantations, but "mitigate" this by establishing a strictly protected forest area in another part of its forest management unit. This amounts to a double whammy for local people: excluded from the land where the plantations are established *and* excluded from the forest which is protected to "offset" the impacts of the plantation.

The Plantations Review Policy Working Group appeared determined to make it as easy as possible for industrial tree plantations to remain certified. The Policy Working Group suggests, for example, that FSC should introduce a "Social Management System" which forest and plantation managers could 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 Policy 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.

The Board of Directors' revisions to the Principles and Criteria suggest introducing a requirement for a Social Management Plan, to include "tenure and use rights, indigenous peoples rights, community relations and worker rights, local development, dispute resolution and stakeholder consultation." The document is to be produced by the company. The certifying body is to monitor the Social Management Plan. The danger is that this could easily further exclude local people from the certification process. Instead of listening to local people, certifying bodies will refer to the Social Management Plan, regardless of the realities faced by local people.

The Board of Directors proposes a new criterion 7.6: "Forest and plantation management shall proactively implement and document appropriate public consultation and communication processes with affected and interested parties." Once again, the risk is that certifying bodies will check what the company says it does, rather than speaking to local people to find out what it is actually doing. In a situation where communities are living in fear of a plantation company which has taken over their land, local people are unlikely to risk speaking in public to a certifying body hired by the company, any more than they would risk speaking to the company itself.

In its final report, the Plantations Review Policy Working Group recommended that "FSC develops one integrated set of common Principles and Criteria for all types of management units rather than the current structure with a common set of nine principles and an additional Principle 10 for Plantations." The Board of Directors decided to ignore this recommendation, to allow FSC members and "stakeholders" to "be given the opportunity to comment on this proposal before embarking on such a restructuring of the P&C". The result of this is that six years after the motion passed at the General Assembly, no concrete proposals have been made for any amendments to the most problematic of FSC's Principles (apart from changing the word "should" to "shall").

Bizarrely, given that the Policy Working Group recommended abolishing Principle 10, one of the Plantations Review Technical Expert Teams is looking at the 1994 cut-off date for conversion of forests to plantations. This is covered in Criterion 10.9, which states that if a plantation manager has cleared forest in order to establish plantations since November 1994, then that operation cannot "normally" be certified under FSC. There are problems with this, since it does not exclude certification of plantations established since 1994 on grasslands, for example. An improvement would be, for example, prohibiting the conversion of grasslands and other ecosystems to plantations.

The Policy Working Group proposed another review to look at conversion, which will consider other ecosystems. However, the Policy Working Group also

suggested 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.” Asia Pulp and Paper is among the companies that has been lobbying for this change.⁴²

In its vision for FSC, the Plantations Review Policy Working Group hopes to see a “significant demand for certified forest [sic] 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 Policy 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.

The Policy Working Group did not raise the bar, it lowered FSC's standards. This is an inevitable result of its wish for a “significant demand for certified forest [sic] products”. FSC is far too keen to pander to the industry that it is supposed to be regulating (albeit on an entirely voluntary basis).

During an NGO meeting in 2004, FSC's Sofia Ryder explained how FSC was trying to make things easier for the industry:

“We're trying to unblock the supply chain. We're trying to make certification more accessible. We're trying to strengthen the standards and tighten them. We're trying to improve incentives and rewards for people to become involved in certification, and we're trying to bring more FSC products into the market.”⁴³

Many of the NGOs present at the meeting questioned whether FSC was actually trying to strengthen its standards. Bringing more FSC products into the market and strengthening standards are not easily compatible goals. Rather than worrying about sales of FSC-certified products, FSC needs to concentrate on the standards that it is supposed to uphold. It should be the industry's responsibility to change to meet these standards and to sell its products, rather than FSC's responsibility to adapt its standards and labels to meet the demands of the industry.

The Plantations Review Technical Expert Teams currently working on the recommendations suggested by the Policy Working Group include several representatives of the industry that FSC is supposed to be regulating. Stora Enso, Potlatch and Timbercorp have a seat at the table.⁴⁴

So far, then, FSC's Plantations Review has been a colossal waste of time, at least for anyone who thought that it might change the way that FSC certified

42 At the 2004 meeting to launch FSC's Plantations Review, one of the people who questioned the 1994 cut-off date was Arian Ardie, then-director for sustainability at Asia Pulp and Paper. Obviously APP had an interest in changing this cut-off date, given the vast area of forests that the company has cleared since 1994.

43 “Presentation by Sofia Ryder, FSC at Forest Movement Europe meeting”, 24 April 2004, Helsinki.

44 “Expert Teams for the Technical Phase of the Plantations Review”, Forest Stewardship Council, 13 December 2007. http://www.old.fsc.org/plantations/docs/Home/2007-12-13_Expert_Teams.pdf

industrial tree plantations. The Plantations Review process has made no difference whatsoever to the way FSC certificates are issued. In October 2005, WRM wrote to FSC demanding a “moratorium on the certification and re-certification of industrial timber plantations”, until the Plantations Review was completed. FSC's board responded that “The main reason for deciding not to seek a moratorium on the certification of large-scale (or 'industrial') tree plantations was that we were not convinced this would be supported by the broad majority of the FSC membership.” They were right. A motion put forward by Robin Wood at the 2005 FSC General Assembly requesting a similar moratorium was rejected by FSC's members.

FSC currently anticipates that its Review of the Principles and Criteria will be completed by the end of 2009.⁴⁵ Meanwhile, as the Plantations Review and the Review of the Principles and Criteria continue, so do the problems with FSC certification of industrial tree plantations. For many, the certification of Veracel in March 2008 was the final straw. WRM called it the death certificate for FSC.⁴⁶ The following section looks at some of the controversies raised by FSC certification of industrial tree plantations.

Veracel, Brazil

Veracel is perhaps the most egregious of FSC's current plantation certificates, although it is certainly not the only one that should be withdrawn. It was certified by SGS in March 2008. SGS issued the certificate just before a team from Accreditation Services International visited Veracel's operations to carry out an audit of SGS's assessment.

Since Veracel established its monoculture eucalyptus plantations in the south of Bahia state, rivers, streams and springs have dried up. As the company expands its area of eucalyptus, the area of land planted to food crops is decreasing. Rural people have lost work and moved to cities to look for work, where many end up living in the favelas surrounding Brazil's cities.⁴⁷ In July 2008, Veracel was fined for clearing areas of Atlantic rainforest and ordered to cut down its plantations and replace them with native trees.⁴⁸ Veracel's FSC

45 “Announcement : Expanded Review and Revision of FSC Principles and Criteria (FSC-STD-01-001 Version 4-0)”, Forest Stewardship Council, 3 September 2008.

46 “Veracel: FSC's 'Death Certificate'”, World Rainforest Movement, March 2008. http://www.wrm.org.uy/actors/FSC/Veracel_Death_Certificate.html

47 See, for example:

Chris Lang (2006) “Veracel pulp mill, Brazil: The impact of industrial tree plantations on land rights and livelihoods”, in “The European Investment Bank in the South. In whose interest?” CRBM, CEE Bankwatch Network, Friends of the Earth International and WEED, February 2006. <http://chrislang.org/2006/02/21/veracel-pulp-mill-brazil-the-impact-of-industrial-tree-plantations-on-land-rights-and-livelihoods/>

“FSC Certification of Veracel: A turning point or business as usual?”, “Brazil: The impossible certification of Veracel”, and “The reasons why Veracel cannot be certified, seen from the standpoint of society”, World Rainforest Movement Bulletin 121, August 2007. <http://www.wrm.org.uy/bulletin/121/viewpoint.html>

Ivone Gonçalves (2007) “Brazil: Response to Veracel's attempt to obtain the FSC label for its plantations”, WRM Bulletin 119, June 2007. <http://www.wrm.org.uy/bulletin/119/Brazil2.html>

“Brazil: Veracel's deceitful practices”, WRM Bulletin 115, February 2006. http://www.wrm.org.uy/bulletin/115/Brazil_2.html

48 “Millions of FSC certified trees to be uprooted as Brazilian court condemns Veracel”, FSC-Watch, 14 July 2008. http://www.fsc-watch.org/archives/2008/07/14/Millions_of_FSC_cert

“Controversy deepens over Veracel certification”, FSC-Watch, 26 August 2008. http://www.fsc-watch.org/archives/2008/08/26/Controversy_deepens_

certificate remains in place. The certification process produced no benefits whatsoever for local communities. On the contrary, it undermines their struggle against Veracel.

Valourec Mannesmann, Brazil

In February 2007, armed guards employed by Valourec & Mannesmann shot and killed Antonio Joaquim dos Santos in front of his 16 year-old daughter. He was collecting firewood. A year before the shooting, a local community submitted an international complaint, pointing out that the destruction of the native cerrado (savanna) vegetation has left the community without access to firewood and fruits and has led to the drying up of the Cana Brava River. V&M's response was to increase the pressure on the community.

The problems with V&M's operations are well documented. In 2002, WRM published a report documenting the problems for local communities living near to V&M's plantations.⁴⁹ The report found the following problems with SGS's assessment:

- “They did not make an in-depth study of the context surrounding the companies planting eucalyptus and neglected a series of important social, economic and environmental aspects;
- “They listened to only a few 'stakeholders' and then only to the least critical ones. They did not listen to the most important 'stakeholders' and therefore, did not obtain essential information on a series of serious problems involving the companies;
- “It was not clear whether the conditions and recommendations in fact reverted the evident lack of compliance with certain FSC principles and/or criteria and whether an adequate follow-up regarding compliance with these conditions and recommendations is being carried out;
- “They did not disseminate the public certification summary for the knowledge of local and regional civil society and the public bodies. SGS did not even place a version of the public summary in Portuguese, the official language of Brazil, on the internet.”⁵⁰

WRM's researchers did not name the people interviewed in their report, and emphasised their “concern over the fear these interviewees feel.” The researchers pointed out that “Certification firms should not be fostering such an atmosphere on repression and fear.”⁵¹

49 Marco Antônio Soares dos Santos André, Rosa Roldán, Fábio Martins Villas, Maria Diana de Oliveira, José Augusto de Castro Tosato, Winfried Overbeek, and Marcelo Calazans Soares (2003) “Evaluation report of V&M Florestal Ltda. and Plantar S.A. Reflorestamentos, both certified by the Forest Stewardship Council”, in “Certifying the Uncertifiable: FSC Certification of Tree Plantations in Thailand and Brazil”, World Rainforest Movement, August 2003. <http://www.wrm.org.uy/actors/FSC/uncertifiable.html>

50 Ricardo Carrere (2006) “Certification of tree plantations by SGS and SmartWood: A history of controversial certifications”, World Rainforest Movement, March 2006. http://www.wrm.org.uy/countries/Uruguay/SGS_Smartwood.html

51 Marco Antônio Soares dos Santos André, Rosa Roldán, Fábio Martins Villas, Maria Diana de Oliveira, José Augusto de Castro Tosato, Winfried Overbeek, and Marcelo Calazans Soares (2003) “Evaluation report of V&M Florestal Ltda. and Plantar S.A. Reflorestamentos, both certified by the Forest Stewardship Council”, in “Certifying the Uncertifiable: FSC Certification of Tree Plantations in Thailand and Brazil”, World Rainforest Movement, August 2003, page 116. <http://www.wrm.org.uy/actors/FSC/uncertifiable.html>

In 2006, a villager told activist and journalist Heidi Bachram that “The threat to workers and people here is great. Shots have been fired on people by the armed guards. They feel prisoners within their own lands.”⁵²

In September 2006, WRM demanded the withdrawal of the V&M certificate, together with those of Suzano and Plantar. “The social and environmental impacts of these three companies are so well documented that it is obvious that the FSC must immediately withdraw its certificate[s],” said Marcelo Calezans of the Brazilian Alert Against the Green Desert Movement.⁵³

A few weeks after the murder of Antonio Joaquim dos Santos, V&M announced its “voluntary decision to leave FSC after 8 years of very close relationship”. FSC took no action against the certifying body, SGS.

Smurfit Cartón de Colombia

The impacts of this company in Colombia are well documented.⁵⁴ The company has deforested large areas and had serious impacts on local communities. WRM visited the company's plantations in November 2003 and interviewed local people. “The plantations have finished off the water,” a villager said. Another noted that “spraying has finished with everything there was in the soil.” Other villagers told WRM that “there is hardly any fauna left,” that there used to be “clouds of birds” and that now “only in the summer does some bird appear, but not in winter time,” and that “there are no fish left either.”⁵⁵

Villagers also complained about working conditions and the fact that it is outsourced. “All the work is seasonal,” one villager said. “The contract implies working for two and earning for one.” There is no trade union and “he who grumbles is out,” a villager said.

Astonishingly, given the record of the company, Smurfit's Victor Giraldo represented the company on FSC's board of directors. None of FSC's members complained about this. Smurfit's operations in Colombia were certified by SGS. SGS is due to re-assess the company in December 2008.

ENCE, Spain and Uruguay

In June 2008, ENCE lost its certificate issued to its Spanish subsidiary NORFOR. Three years previously, the Association for the Defence of the Galicia Estuary (Asociación pola defensa da Ria de Galicia) sent a letter to FSC's representatives in Spain demanding the urgent cancellation of NORFOR's certificate. The letter was accompanied by a detailed 85-page report, which documented how the company was in breach of FSC's

52 Heidi Bachram (2006) “Carbon credits and the green desert”, *Red Pepper*, September 2006.
<http://www.redpepper.org.uk/Carbon-credits-and-the-green>

53 “Organizations from eight countries demand the FSC to withdraw its 'green label' to several plantation companies”, World Rainforest Movement press release 1 September 2006.
http://www.wrm.org.uy/actors/FSC/Campaign_De_Certification/De_Certification_Campaign.html

54 Joe Broderic (1998) “El imperio de cartón: impacto de una multinacional papelera en Colombia”, cited in “Colombia: The uncertifiable plantations of a member of the FSC Board of Directors”, World Rainforest Movement Bulletin 77, December 2003. <http://www.wrm.org.uy/bulletin/77/Colombia.html>

55 “Colombia: The uncertifiable plantations of a member of the FSC Board of Directors”, World Rainforest Movement Bulletin 77, December 2003. <http://www.wrm.org.uy/bulletin/77/Colombia.html>

standards.⁵⁶ A coalition of NGOs in Spain campaigned for the certificate to be withdrawn, pointing out NORFOR's "indiscriminate use of herbicides such as glyphosate, practices of excessive damage to subsoil and consequent increase in erosion, clear-cuttings of more than 20 hectares, and the complete lack of promotion of the use of native species in their plantations". Several NGOs left the FSC in protest about the certification of Norfor.⁵⁷

ENCE's Uruguayan subsidiary Eufores is also FSC certified. In August 2008 Eufores was caught destroying 80 hectares of forest, which is strictly protected under Uruguayan law.⁵⁸

A 2007 report by the Latin American Network of Action on Pesticides and their Alternatives (RAP-AL) Uruguay found that working conditions in ENCE's nurseries were poor and that two chemicals were used which are banned under FSC's pesticides policy.⁵⁹

FSC has taken no action, either against Eufores, or against SGS, the certifier. Indeed, when WRM sent a copy of its 2006 report, which documents the impact of the plantations on rural communities in Uruguay, including those of Eufores, FSC responded by issuing a statement claiming that "FSC guarantees peace of mind," for consumers in the North.⁶⁰

Coillte, Ireland

Coillte has about 450,000 hectares of pesticide-laden monoculture plantations in Ireland.⁶¹ After seven years of complaints about the certification of Coillte, Accreditation Services International (ASI), which is supposed to ensure that certifying bodies are upholding FSC's standards, carried out an audit of Soil Association's Woodmark assessment of Coillte.⁶²

ASI found a series of breaches of FSC standards. Woodmark had "closed out" its Corrective Action Requests against Coillte without documenting why it had done so. ASI also found that Woodmark had "kept open" other Corrective Action Requests for long periods, in breach of FSC's rules. As a result, notes ASI, "non-compliance with relevant FSC Criterion is likely to be ongoing for a few years". Nevertheless, Coillte remains certified. FSC has taken no action

56 Ricardo Carrere (2006) "Certification of tree plantations by SGS and SmartWood: A history of controversial certifications", World Rainforest Movement, March 2006.
http://www.wrm.org.uy/countries/Uruguay/SGS_Smartwood.html

57 "ENCE loses one certificate in Spain. Soon to lose another in Uruguay?", FSC-Watch, 22 August 2008.
http://www.fsc-watch.org/archives/2008/08/22/ENCE_loses_one_certi

"Another NGO quits FSC in protest against NORFOR plantations", FSC-Watch, 29 May 2008. http://www.fsc-watch.org/archives/2008/05/28/Another_NGO_quits_FS

58 "ENCE loses one certificate in Spain. Soon to lose another in Uruguay?", FSC-Watch, 22 August 2008.
http://www.fsc-watch.org/archives/2008/08/22/ENCE_loses_one_certi

59 "Banned chemicals used in FSC-certified nurseries in Uruguay", FSC-Watch, 4 October 2007. http://www.fsc-watch.org/archives/2007/10/04/Banned_chemicals_used_in_FSC-certified_nurseries_in_Uruguay

60 "Certified plantations in Uruguay: Can the FSC really guarantee peace of mind to consumers?", WRM Bulletin 108, July 2006. http://www.wrm.org.uy/bulletin/108/Uruguay_Peace.html

61 John Vidal and David Adam (2008) "Timber hitch", Eco-soundings, The Guardian, 30 April 2008.
<http://www.guardian.co.uk/environment/2008/apr/30/1>

62 "How Accreditation Services International (FSC-ASI) allows certifiers to break FSC's rules and issue certificates to non-compliant companies", FSC-Watch, 16 March 2008. http://www.fsc-watch.org/archives/2008/03/16/How_Accreditation_Se

against the certifying body, Woodmark.

Sappi and Mondi, South Africa and Swaziland

An area of just over 1.6 million hectares of industrial tree plantations has been certified in South Africa.⁶³ The plantations have dried up streams, destroyed grasslands, taken over people's land and introduced exotic tree species which are invading ecosystems outside the plantation areas. Every year thousands of hectares of the monocultures burn, with devastating consequences for local communities, especially when their villages are completely surrounded by plantations. Last year, dozens of people were killed in the fires.

As Philip Owen of the South African NGO Geosphere points out, "Plantation management operations destroy grassland's multiple products and services - thereby undermining economic viability and a wide range of environmental and social benefits." Owen points out that SAPPI's plantations above the Sudwala caves in Mpumalanga are "contributing to the un-natural and excessive drying out of the [cave] system". Geosphere has made a formal complaint to Woodmark about the certification and is demanding that SAPPI removes the trees above the caves and allows the grassland to recover.⁶⁴

In Swaziland, Woodmark ignored the impacts of SAPPI's plantations on water supply to neighbouring farms, despite the fact that one of the farmers is suing SAPPI because of these impacts. Fires in Swaziland in 2007 were declared a national emergency and this year a contractor died in the fires.⁶⁵

Asia Pulp and Paper, Indonesia and China

In December 2007, FSC announced its "dissociation" from pulp and paper giant Asia Pulp and Paper. FSC issued a statement saying that it has "a duty to protect the good will and integrity associated with its name and logo for consumers and for our trusted partners and members."

FSC noted that "Reports from WWF, Greenpeace, Eyes on the Forest and many other independent sources suggest that APP is actively conducting forestry practices contrary to FSC Principles and Criteria."⁶⁶

The dissociation became necessary after "APP gained certification for products produced at an Indonesian mill from FSC certified pulp purchased on international markets. The company has used this partial certification to associate itself more generally with FSC," according to a statement by FSC Australia.⁶⁷

63 According to a search for Forest Management certificates in South Africa on "FSC registered Certificates". <http://www.fsc-info.org>

64 "The 'many wrongs' of FSC in South Africa", FSC-Watch, 20 July 2008. http://www.fsc-watch.org/archives/2008/07/20/The_many_wrongs_of

65 "Fires kill Sappi Usutu contractor", RISI. <http://www.risiinfo.com/pulp-paper/news/Fires-kill-Sappi-Usutu-contractor.html>

66 "FSC dumps Asia Pulp and Paper - but who was to blame?" FSC-Watch, 10 January 2008. http://www.fsc-watch.org/archives/2008/01/10/FSC_dumps_Asia_Pulp_

67 "FSC steps up action to block greenwash", FSC Australia, 9 November 2007. <http://www.fscaustralia.org/files/100/fsc%20news%20release%207%202007%20-%20app%20%20partial%20certification.pdf>

Another FSC statement about APP, available on FSC Canada's website, states that

“[E]ven with our policy structure in place it remained possible for companies to participate in the FSC system while simultaneously engaging in unacceptable forestry practices. As a result, in March 2007, the FSC Board of Directors mandated the FSC International Center to follow a new and broader approach, which entailed the development of criteria for the association of any third party with FSC's good name and trademarks.”⁶⁸

FSC produced a draft “Policy for the Association with FSC”, which it circulated to members in October 2007. Since then, the draft Policy seems to have disappeared without trace, and the dissociation from APP remains a one-off for FSC.

Stora Enso's operations in Brazil, Argentina and Uruguay

Stora Enso has some of its operations certified by FSC, including its share of Veracel. FSC's rules are supposed to prevent companies from greenwashing their operations by certifying one part but carrying out socially and environmentally destructive activities elsewhere.

Earlier this year, about 900 women from the International Peasant Movement, Via Campesina, were violently evicted by the Military Police from an area of 2,100 hectares of Stora Enso's plantations in Rio Grande do Sul, Brazil. According to a statement from Via Campesina about 60 women were badly injured and 800 were arrested. The women were protesting against Stora Enso's monoculture eucalyptus plantations, which the company is currently establishing in Rio Grande do Sul.⁶⁹

In August 2008, the Movement of Landless Peasants (MST) and Via Campesina in Brazil launched an international campaign against Stora Enso, in protest against the company's expansion of its plantations in Brazil, Uruguay and Argentina. Predictably, Stora Enso's response was to question the information that Via Campesina and MST provided. FSC has taken no action against Stora Enso, or against the certifying bodies that have certified Stora Enso's operations.⁷⁰

FSC's goal, according to the introduction to the Principles and Criteria, is “to promote environmentally responsible, socially beneficial and economically viable management of the world's forests.”⁷¹ FSC should not certify industrial

68 “Asia Pulp & Paper (APP) – FSC Trademark Notice”, FSC Canada. <http://www.fscscanada.org/APP.htm>

69 “Police repress peasant women to protect Swedish-Finnish company Stora Enso's illegal plantations”, World Rainforest Movement press release, 7 March 2008. <http://pulpinc.wordpress.com/2008/03/07/police-repress-peasant-women/>

“Women of the Via Campesina occupy area of Stora Enso in the Rio Grande do Sul state”, Via Campesina press release, 4 March 2008. <http://pulpinc.wordpress.com/2008/03/04/via-campesina-occupy-area-of-stora-enso/>

70 “International Campaign against Stora Enso”, Pulp Inc. 19 August 2008.

<http://pulpinc.wordpress.com/2008/08/19/international-campaign-against-stora-enso/>

71 From the Introduction to “FSC Principles and Criteria for Forest Stewardship”, FSC-STD-01-001 (version 4-0) EN,

tree plantations, for the simple reason that they are not forests. Industrial tree plantations are neither environmentally responsible nor socially beneficial. They are often not even economically viable, at least not without generous government subsidies. FSC should therefore not certify them.