



DIN Deutsches Institut für Normung e.V. – Berlin

ABNT Associação Brasileira de Normas Técnicas– Rio de Janeiro

August 9, 2013

Dear Mr. Ziethen,
Dear Mr. de Simone,

Thank you for the response of 2nd August on the joint FSC/PEFC letter opposing your initiative for an ISO standard on CoC for Forest Management. It was dated 2nd of August, but unfortunately we received it only yesterday.

We are surprised and disappointed to see that you repeat the misinformation you gave in your proposal that FSC and PEFC were consulted beforehand and did not oppose it. In particular you refer to a meeting in the context of the Rio+20 Conference. In fact, Mr. de Freitas, the previous Managing Director of FSC, was confronted with an unannounced presentation during an informal dinner in the margins of Rio+20, and he confirmed to us, in writing, that he, at that moment, did exactly the opposite of what you suggest: he clearly expressed his disbelief in the concept. So from that conversation no support or acceptance of the initiative can be concluded.

We have no records in our files of having received a draft version of the proposal, and in fact our first opportunity to study the proposal was when we received the final version, at the same time it was sent to ISO members for voting, the 28th of May this year.

In your letter you defend your initiative with figures about extra costs companies would be faced with due to the existence of two parallel CoC systems. Unfortunately you have not provided either the voting members or us with evidence of these figures, so they are difficult to question or confirm. We are convinced the extra costs are exaggerated, and that there are practical ways to reduce these by companies concerned in cooperation with their certification bodies.

You say such extra costs “could be overcome by just one standard.” That statement makes it clear what your objective is: to create an ISO Standard that would replace the FSC and PEFC CoC standards. This understanding is confirmed when you invite us to cooperate and say we are “free to subsequently use and integrate the standard in (our) work.”

The consequence of this is that you aim to transfer the decision-making power about forest certification related CoC standards from the members and stakeholders of the certification organisations to the ISO membership. We strongly protest against this. The FSC CoC standard is part of a wider system to guarantee that products with this label are based on sustainable forest management as prescribed by FSC forest management requirements, and is processed and traded by companies that are not only controlled regarding the actual throughput and use of the forest materials concerned, but also fulfil

1 of 2



themselves certain basic legal, environmental and social requirements. The combination of these aspects is the basis for the confidence given to the FSC system by industry, environmental and social organisations, authorities and consumers. It is essential that FSC with its broad membership and balanced multi-stakeholder procedures maintains control over the CoC requirements. Creating an ISO Standard for the same purpose will undermine the coherence of this system and most likely affect negatively its environmental and social impacts.

You also state that ISO standards would be in our advantage, “due to their global nature - open up world markets”. World markets are currently not closed for FSC (or PEFC) products, and our CoC standard is global as well. The demand and supply of certified forest products is already substantial and growing fast. See the figures produced by UNECE/FAO, of a 27% market share for certified round wood globally in 2011.

Our mission is to promote sustainable forest management. The credibility of both the forest management system and the CoC has to be ensured by the permanent control by our membership and the balanced multi-stakeholder decision-making system that we have set up and used for 2 decades. Intervention by ISO in part of this process we see as counterproductive, and not in the interest of sustainable forest management.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Kim Carstensen".

Kim Carstensen
Managing Director