



Roadmap towards APP compliance with the FSC Policy for Association

- Frequently Asked Questions -

About the process

What is the Policy for Association?

The FSC Policy for Association (PfA) – FSC-POL-01-004 *Policy for the Association of Organizations with FSC* – is an expression of the values shared by organizations associated with FSC. It defines six unacceptable activities that associated organizations commit to avoiding in both their certified and non-certified operations:

- a) Illegal logging or trade in illegal wood or forest products.
- b) Violation of traditional and human rights in forestry operations.
- c) Destruction of high conservation values in forestry operations.
- d) Significant conversion of forests to plantations or non-forest use.
- e) Introduction of genetically modified organisms in forestry operations.
- f) Violation of any of the Core Conventions of the International Labour Organization.

Organizations that are found to be directly or indirectly involved in one or more of these activities will be disassociated from FSC.



What is the difference between FSC forest management certification and conformity with the PfA?

FSC forest management certification only covers the forest management unit, which is assessed by an accredited certification body for compliance with the FSC Principles and Criteria. For conformity with the PfA, an organization's entire forest management operations, certified and non-certified, must not be involved in any of the unacceptable activities stipulated by the policy.

What does the term 'disassociation' mean?

Disassociation is the termination of all existing contractual relationships between FSC and an organization, such as FSC membership or an FSC trademark licensing agreement. Disassociation decisions are taken by the FSC Board of Directors and usually imply that an organization has been found involved in one of the unacceptable activities specified in the FSC PfA. Disassociation leads to the suspension of any FSC certificates an organization may hold, as a valid FSC licensing agreement is a prerequisite for certification.

An organization's disassociation status can be ended by FSC, but that does not automatically lead to a new form of association. It requires the formerly disassociated organization to apply for a corresponding new contractual relationship (e.g. membership, certification) and for this application to be analysed and then approved by FSC or an accredited certification body.

What is the purpose of a 'roadmap towards compliance with the FSC PfA'?

A roadmap (towards ending the disassociation status of an organization) is an action and reporting plan, jointly agreed between FSC and the disassociated organization. It is based on conditions for how to correct, compensate for, and prevent reoccurrence of previously identified infringements of the PfA. The roadmap will provide stakeholders with benchmarks for the dissociated organization's performance in relation to the FSC PfA and its need for further improvements.

Why did FSC decide to accept APP's proposal to work towards ending the disassociation?

Initially, FSC disassociated from the Asian Pulp & Paper Group (APP) in 2007 due to substantial, publicly available information that APP was involved in destructive forestry practices. In 2012, APP approached FSC, stating it would like to enter into a constructive dialogue on the possibility of ending this disassociation. Since then, FSC has reviewed APP's overall commitment towards complying with the PfA, and APP's progress on implementing its Forest Conservation Policy. In August 2015, the FSC International Board of Directors decided to enter into the roadmap phase, after an evaluation concluded that senior APP management had demonstrated commitment to complying with the PfA, had adopted relevant policies to improve its previous business practices, and had begun credible steps towards implementation of these policies in a transparent manner involving relevant stakeholders.



Why does the roadmap not specify due dates for the various commitments and its overall completion?

It is left to the discretion of APP to decide how quickly it can and wants to implement the commitments specified in the roadmap. An ending of the disassociation will only be considered once the roadmap process has been completed. Therefore, the roadmap only specifies what has to be achieved under each of the five commitments listed in the roadmap.

When will APP be able to produce and sell FSC-certified products?

Ending the disassociation, if it happens, will not mean that APP's concessions can automatically be considered responsibly managed or FSC certifiable. It will simply constitute an acknowledgment that APP has ceased forest-related practices that are considered unacceptable under the FSC PfA.

To become certified and thereby re-associated, APP will still need to follow the general certification processes for its mills to achieve FSC chain of custody certification, and for its concessions to achieve controlled wood or forest management certification. Under current FSC rules, plantations established by conversion after 1994 are not eligible for full forest management certification.

What will the next steps be after this consultation?

The FSC secretariat will finalize the revised roadmap after review, and incorporate comments received. Upon publication of the final version of roadmap, APP will start the implementation of its commitments.



Contents of the roadmap

Why are there no more specific requirements for APP concessions other than to meet or work towards compliance with the FSC controlled wood standard?

Conformity with the FSC PfA can be demonstrated through compliance with the FSC controlled wood standard, as both normative frameworks aim to address the same set of controversial or unacceptable activities. The controlled wood standard requires the prevention of wood from unacceptable sources from entering FSC supply chains, while the PfA requires an organization not to become such a source itself.

Why has a difference been made between APP suppliers' concessions and APP's own concessions?

The PfA applies to APP and its subsidiaries only. It does not apply to APP's suppliers, which is why different degrees of implementation are specified for APP's own concessions and those of its suppliers. Reaching full and verified compliance of the (29) supplier concessions with the FSC controlled wood standard has therefore not been made a prerequisite for the FSC Board to take a decision on ending the disassociation.

How will the controlled wood verification be conducted for APP concessions?

The verification will be conducted in the form of a formal certification audit, but the absence of major non-compliances alone will not result in the issuing of a certificate. Only once the overall roadmap has been completed will the FSC Board take a decision about ending the disassociation. Should this decision be positive, the verified concessions will be able to obtain a controlled wood certificate.

What is the High Carbon Stock Approach?

The High Carbon Stock (HCS) Approach is a methodology that distinguishes forest areas for protection from degraded lands with low carbon stocks and low biodiversity values, with the purpose of developing the degraded lands as plantations.

The amount of carbon and biodiversity stored in an area of land varies according to the type of vegetation cover. Analysis of satellite images and field-plot measurements divides natural vegetation into six different classes: high-density forest; medium-density forest; low-density forest; young regenerating forest; scrub; and cleared/open land. The first four classes are considered to be potential HCS forests.¹

¹ <http://highcarbonstock.org/>