

PEFC comments on recent WWF's 2008 certification scheme assessment and public statement on PEFC Stakeholder Forum

PEFC International welcomes WWF's recent encouraging and positive remarks that PEFC's ongoing reforms are "*steps in the right direction*".

WWF has highlighted positively PEFC's increased focus on stakeholder engagement, in particular the establishment of the Stakeholder Forum¹ and its engagement with environmental, forestry worker, indigenous peoples and consumers organisations at all levels; its efforts to develop certification schemes in the tropics; and its continuous efforts to monitor and ensure robust implementation of its requirements at all levels in a public statement² responding to PEFC's invitation to join its newly established Stakeholder Forum.

Whilst WWF acknowledges that different schemes contribute to improved forest management, it will continue to focus its active efforts on improving the FSC system, and decided not to participate in PEFC processes at this stage.

WWF has based this decision³ on the findings of a WWF-commissioned assessment⁴ using the World Bank/WWF Forest Certification Assessment Guide (FCAG)^{5,6}.

The WWF/World Bank Global Forest Alliance, which developed the FCAG, defined as one of its primary goals to "*promote improved forest management through the adoption of best practices and the verification of their implementation based upon performance reviews conducted by independent parties*"⁷. In this context, one of the applications of FCAG is as "*serving as a diagnostic tool for WWF and the World Bank to identify and target capacity-building efforts to strengthen certification systems and schemes*"⁸.

PEFC therefore regrets WWF's decision to solely focus on one forest certification system, rather than working in tandem with both sustainable forest management systems. This is regrettable, particularly so as the decision was based on a report of questionable rigour and objectivity.

However, given the potential contribution that sustainable forest management and its certification can make in tackling societal challenges such as climate change, there is an urgent need for global forest leaders to join forces. With only 9 percent of the world's forest certified, collaboration and partnerships are of fundamental importance in expanding and further improving sustainable forest management.

All forest stakeholders are well aware that there are different strengths and weaknesses in both PEFC and FSC. Nevertheless, such differences are advantageous in our common endeavour to promote sustainable forest management worldwide. The different strengths allow society to take advantage of the two global certification systems by utilising their best

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practices and experiences that are most suited to the specific needs and requirements at local level.

Given the different nature of PEFC and WWF and the expectations of their stakeholders, the respective definitions of sustainable forest management of the two organisations may never be fully aligned. At the same time, independent assessments – most recently the UK Department for Environment, Food and Rural Affairs⁹ - find equivalency between PEFC and FSC in delivering towards their sustainability criteria.

PEFC respects WWF's right to choose its preferred partner, but calls on the organisation to re-consider its decision and also to engage with PEFC to fully utilise the work of the two global, credible forest certification systems, PEFC and FSC, in its efforts to promote sustainable forest management.

Such an engagement would allow WWF to gather first-hand experience about the work and operations of PEFC. Considering how the certification debate has matured, WWF's current knowledge base would be better complemented by direct involvement, instead of predominantly relying on arms length desktop-based studies whose scope is by default limited and whose integrity in doubt.

Evaluating certification schemes is, as pointed out by the FCAG, a complex task¹⁰. The World Bank, which sees the FCAG only as a "*first step*" that will "*highlight strength and weaknesses and deliver general information on the performance*"¹¹, specifies that such assessments, in many cases, require the employment of an audit team rather than a single auditor, that there should be no conflicts of interest with the regard to the certification system under assessment, and the need for direct consultations with certification systems personnel on the draft findings.¹²

There is considerable doubt that these fundamental requirements were adhered to in the compilation of the study.

- The study was compiled by a single auditor (Dr. Martin Walter, lecturer at the University of Applied Sciences in Weihenstephan, Germany) rather than an audit team.
- It fails the basic requirement of "no conflicts of interest" as the auditor, in addition to being a member of FSC as disclosed in the assessment, also worked as a national consultant for FSC Germany¹³, contributed to the work of FSC International^{14,15} and served as a representative of Accreditation Service International (ASI)¹⁶, a wholly-owned subsidiary of FSC.
- No direct consultation with certification systems personnel took place, which has seriously compromised the usefulness of the report.¹⁷

Furthermore, it is questionable whether the requirement for "*in-depth knowledge of international systems for conformity assessment and certification*" as emphasised by the FCAG was fulfilled^{18,19}, and whether he adhered to the recommendation that "*the task demands that teams exercise considerable judgement in applying this tool*".^{20,21,22}

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Finally, there are challenges regarding the documentation utilized for the assessment, especially in the case of FSC:

- The validity of 8 out of the 14 documents used for the analysis of FSC in the 2008 assessment had expired. On top of this, these 8 documents were out of date even at the time of the initial assessment.
- An additional 3 out of the 14 documents used for the analysis of FSC were only available in draft ("*publication pending until finalisation*"), even though the author states that the study is "*based solely on publicly available documentation*"²³. Any modifications to these documents at the point of finalisation are not reflected in the assessment.
- No references were made in regards to documents used for the assessment of FSC at national level; no evidence is given that international rules were followed at the national level, and thus independent verification of the findings is impossible.

WWF is quite rightly renowned and held in high esteem globally for its commitment and work on the environment. There is, however, considerable doubt as to whether the study meets the high standards that WWF is known for and that are required by customers and stakeholders in forest certification, like the Global Forest Trade Network members, for their decision making processes.

Given the urgency of promoting sustainable forest management, and its contribution to tackling climate change and other societal challenges, PEFC reiterates its desire to work constructively and openly with WWF and all other stakeholders.

PEFC Council

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¹ Further information about the Stakeholder Forum is available at http://www.pefc.org/internet/html/news/4_1154_65/5_1105_1971.htm

² The Public Statement is available at http://assets.panda.org/downloads/2009_02_09_wwf_statement_on_pefc_final.pdf

³ According to http://www.panda.org/what_we_do/knowledge_centres/forests/our_solutions/responsible_forestry/news/?150601, WWF bases its decision predominantly on four reports, of which only two consider PEFC. In addition to the 2008 FCAG assessment, WWF refers to "*An analysis of Corrective Action Requests (CAR) of FSC and PEFC across six countries in Europe*". This study, already four years old, was compiled by Peter Hirschberger, a WWF staff member, who initiated a process to set up a national FSC standard in Austria. Whether this report is therefore unbiased and impartial is in question. See the minutes of the FSC-Switzerland board meeting, 25 April 2006, p. 5 (in German). Available at www.fsc-schweiz.ch/index.php?option=com_docman&task=doc_download&gid=140&Itemid=27&lang=de

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⁴ The "Analysis of the FSC and PEFC Systems for Forest Management Certification using the Forest Certification Assessment Guide (FCAG)", Dr. Martin Walter, August 2008, is available at http://assets.panda.org/downloads/2008_11_17_final_fcag_assessment_.pdf

⁵ The FCAG has been said to lack impartiality. A report commissioned by the International Timber Trade Organisation (ITTO), an intergovernmental organization promoting the conservation and sustainable management, states that "*FCAG could be interpreted to favour the FSC due to strong linkages with the ISEAL rules*" (see ITTO Technical Series #29: Developing Forest Certification, May 2008, p. 13, available at http://www.itto.or.jp/live/Live_Server/4092/TS29.pdf)

⁶ The "World Bank/WWF Forest Certification Assessment Guide (FCAG)" is available at <http://assets.panda.org/downloads/fcagfinal.pdf>

⁷ See FGAC, p. 1

⁸ See FCAG, p. 2

⁹ See "Central Point of Expertise on Timber: Review of forest certification schemes", available at <http://www.proforest.net/cpet/activities-and-news/news-stories/resolveuid/d12847c71070aad087adcc277d84ec27>

¹⁰ See FCAG, p. 3

¹¹ See "World Bank Forest Source Book", Chapter 11, p. 339, available at <http://siteresources.worldbank.org/EXTFORSOUBOOK/Resources/completestorestsourcesbookapril2008.pdf>

¹² See "Annex 11A: Model Terms of Reference For Assessment of Certification Systems" in "World Bank Forest Source Book", Chapter 11, p. 341

¹³ See "Aspects of quality assurance under the certification schemes FSC and PEFC", page 51, available at www.rainforest-alliance.org/forestry/documents/aspects.pdf

¹⁴ See "Some notes on the early years of FSC", page 40, available at http://www.fsc.org/fileadmin/web-data/public/document_center/publications/Notes_on_the_early_years_of_FSC_by_Tim_Synnott.pdf

¹⁵ See "FSC-Gruppenzertifizierung für die Chain of Custody", footnote 1, available at http://www.fsc-deutschland.de/infocenter/docs/newslett/GroupCoC_deu.pdf

¹⁶ See "Public Summary", p. 2, available at www.sqs.ch/it/fsc_basel_1aa.pdf

¹⁷ The auditor scored "*not fulfilled*" for PEFC systems on the basis that the evidence in question "*could not be found*" or because it was unclear whether the scope of specific requirements covered the FCAG criteria. Direct consultation with systems personnel would have clarified these issues.

¹⁸ The auditor separately analysed the PEOLG, ATO/ITTO PC&I, and ITTO Guidelines in regards to FCAG criterion 2.a: Compliance with all relevant laws. However, he failed to consider Annex 3 of the PEFC Technical Documentation, which is applicable to all schemes and clearly requires compliance with all relevant laws. See "Annex 3: Basis for Certification Schemes and their Implementation", Section 3.2, page 4, available at http://www.pefc.org/internet/resources/5_1177_451_file.2027.pdf

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¹⁹ The auditor failed to note that ISO Guides 62 and 66 are no longer valid and have been replaced by ISO 17021. See http://www.iso.org/iso/catalogue_detail?csnumber=29343

²⁰ "FCAG Criterion 1e: Standard setting body is affiliated with the ISEAL Alliance" is a proxy for participation in standards development. While the auditor appears to be recognising this fact (see "Analysis of the FSC and PEFC Systems for Forest Management Certification using the FCAG", p. 8) and emphasises the need for an analysis of the internationally applicable PEFC requirements, he actually concludes that this goes beyond the scope of the study and scored PEFC as "not fulfilled" despite the fact that there was no further analysis on which any judgement could have been based.

²¹ It is impossible for the reader to independently verify the findings as no evidence is provided in cases when the auditor deemed a criterion "not fulfilled".

²² The auditor scores "fulfilled" for FSC for "FCAG Criterion 3.b.b.: Relevant stakeholder groups participated meaningfully." It is impossible to understand how the auditor reached this conclusion given that he explicitly states that "*it is difficult to evaluate this requirement on the basis of available information*".

²³ See "Analysis of the FSC and PEFC Systems for Forest Management Certification using the Forest Certification Assessment Guide (FCAG)", p. 4