

Commentary

## Comments on ‘Straka, T.J.; Layton, P.A. Natural Resources Management: Life Cycle Assessment and Forest Certification and Sustainability Issues. *Sustainability* 2010, 2, 604–623’

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**Abstract:** Unreferenced statement on page 608: “A fundamental difference between FSC and PEFC is the stakeholders. While FSC was founded mainly by environmental groups, PEFC had strong forest industry and trade groups among its founders. This is one reason FSC is not a member of PEFC. Both the ATFS and SFI are recognized by PEFC as acceptable standards”.

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We have recently received a copy of the article “Natural Resources Management: Life Cycle Assessment and Forest Certification and Sustainability Issues” [1]. We noted the following unreferenced statement on page 608: “A *fundamental difference between FSC and PEFC is the stakeholders. While FSC was founded mainly by environmental groups, PEFC had strong forest industry and trade groups among its founders. This is one reason FSC is not a member of PEFC. Both the ATFS and SFI are recognized by PEFC as acceptable standards*”. This statement is incorrect.

PEFC was established by small- and family forest owners, and the early involvement of these stakeholders has allowed PEFC to become the certification system of choice for small- and family forest owners [2]. PEFC represents the interest of forest stakeholders from all sectors of society. The PEFC International Board of Directors includes, among others, representatives from environmental NGOs, labour unions, forest owners, and forest industry [3]. PEFC members include national certification systems (which themselves usually represent multiple stakeholder groups) as well as international organizations [4]. Also, different from other global certification systems, PEFC finances itself almost exclusively from membership fees, with the amount of donations by stakeholders, including business, being less than 1% of the total budget [5].

Please note that for FSC, its historical origins go back to a “First meeting of a group of timber users, traders and representatives of environmental and human-rights organizations in California, USA” [6].

The statement continues with “*The objectives, standards, and criteria used by the various certification groups tend to be similar. However, structural differences in the programs result in significant differences in terms of what is permitted on the ground. Rules may vary due to differences in regional or national laws or standards [21]. Differences tend to result from the focus of the founding groups; environmental groups established standards somewhat different than those established by forest industry groups. FSC, for example, founded by environmental groups, stressed basic goals like minimizing forest conversion, respect of international workers rights, respect of human rights with particular attention to indigenous peoples, limited use of hazardous chemical, no corruption, and special protection for special cultural areas*”. This statement is misleading.

PEFC stresses similar basic goals, and goes on a number of aspects further than FSC. In example, PEFC was the first global certification system that required compliance with the fundamental ILO conventions [7], and it remains the only global certification system that requires compliance to these conventions even in countries that have not ratified the conventions [8].

PEFC also minimizes conversions [9], respects human rights with particular attention to indigenous peoples [10], limits the use of hazardous chemicals [11], no corruption [12], and special protection for special cultural areas [13].

## References and Notes

1. Straka, T.J.; Layton, P.A. Natural Resources Management: Life Cycle Assessment and Forest Certification and Sustainability Issues. *Sustainability* **2010**, *2*, 604–623.
2. See UNECE/FAO Forest Products Annual Market Review 2008–2009 (p. 114): “There is a fairly clear split in Europe between large State and industrial ownerships on the one hand, which tend to adopt FSC certification, and small non-industrial private ownerships on the other, which tend to adopt PEFC certification”.
3. Programme for the Endorsement of Forest Certification (PEFC). *Board of Directors*; Available online: <http://pefc.org/index.php/about-pefc/governance/board-of-directors> (accessed on 31 May 2010).
4. Programme for the Endorsement of Forest Certification (PEFC). *Membership*; Available online: <http://pefc.org/index.php/about-pefc/membership> (accessed on 31 May 2010).
5. Programme for the Endorsement of Forest Certification (PEFC). *Governance*; Available online: <http://pefc.org/index.php/about-pefc/governance> (accessed on 31 May 2010).
6. Forest Stewardship Council (FSC). *Some History*; Available online: <http://www.fsc.org/history.html> (accessed on 31 May 2010).
7. Programme for the Endorsement of Forest Certification (PEFC). *What Makes PEFC Unique?* Available online: <http://pefc.org/index.php/about-pefc/what-makes-pefc-unique> (accessed on 31 May 2010).

8. PEFC requirement: “The fundamental Conventions of the ILO, as amended, whether ratified or not, shall be respected in the implementation of SFM”. See PEFC Technical document, Chapter 4.6, available online: <http://pefc.org/index.php/standards/technical-documentation/pefc-international-standards/item/422-pefc-technical-document> (accessed on 31 May 2010). FSC requirement: This FSC policy is based on the following premises: 1. Forest managers are legally obliged to comply all ILO Conventions which have been ratified in that country. 2. forest managers are expected to comply with the eight core (fundamental) ILO conventions in all ILO member countries, by virtue of their country’s ILO membership, even if not all the conventions have been ratified. 3. FSC’s policy for voluntary certification expects managers to comply with all the ILO conventions that have an impact on forestry operations and practices, in all countries (including countries which are not ILO-members, and have not ratified the conventions). See FSC-POL-30-401 (2002) EN, page 3, available online: [http://www.fsc.org/fileadmin/web-data/public/document\\_center/international\\_FSC\\_policies/policies/FSC\\_POL\\_30\\_401\\_EN\\_FSC\\_certification\\_and\\_ILO\\_Conventions\\_2002.pdf](http://www.fsc.org/fileadmin/web-data/public/document_center/international_FSC_policies/policies/FSC_POL_30_401_EN_FSC_certification_and_ILO_Conventions_2002.pdf) (accessed on 31 May 2010).
9. PEFC technical documentation contains several provisions related to conversions. All the criteria prohibit conversions of forests to other uses including conversion to forest plantations implicitly, and this prohibition interpretation is the one that the PEFC Council uses in assessing national schemes against the PEFC requirements.
10. PEFC technical documentation contains several provisions related to human rights and indigenous people. For example, Indicator 4.1.1 in the ATO/ITTO principles, criteria and indicators for the sustainable management of African natural tropical forests (page 23) requires that “The legal and customary rights of local populations in respect to the ownership, use and tenure of the forest land and resources are clearly defined, acknowledged and respected”. Available online: <http://pefc.org/images/stories/documents/pefc-technical/ITTO-ATO.pdf> (accessed on 31 May 2010).
11. PEFC technical documentation contains several provisions related to the minimization of hazardous chemicals. For example, Criterion 2.2.c in the Pan-European Operational Level Guidelines for Sustainable Forest Management, page 6, requires that “The use of pesticides and herbicides shall be minimised, taking into account appropriate silvicultural alternatives and other biological measures”. Available online: <http://pefc.org/images/stories/documents/pefc-technical/MCPFE-PEOLG.pdf> (accessed on 31 May 2010).
12. Compliance with legislation is a fundamental requirement in any credible forest certification system. PEFC requires that “National forest certification criteria and certified forest management shall respect the relevant legal requirements, national policies and programmes”. See PEFC Technical document, Chapter 4.6, available online: <http://pefc.org/index.php/standards/technical-documentation/pefc-international-standards/item/422-pefc-technical-document> (accessed on 31 May 2010).

13. PEFC technical documentation contains several provisions related to human rights and indigenous people. In example Criterion 6.1.d in the Pan-European Operational Level Guidelines for Sustainable Forest Management, page 10, requires that “Sites with recognised specific historical, cultural or spiritual significance shall be protected or managed in a way that takes due regard of the significance of the site”. Available online: <http://pefc.org/images/stories/documents/pefc-technical/MCPFE-PEOLG.pdf> (accessed on 31 May 2010).

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