



October 13, 2008

Andre Giacini de Freitas
Executive Director
FSC International
Charles de Gaulle Str. 5
53113 Bonn
Germany

Dear Mr. Freitas:

Congratulations on your new position and I hope this letter finds you well. At Rainforest Action Network, we are very excited about the upcoming FSC General Assembly, which we plan to attend. We look forward to the opportunity to meet with other FSC members and contribute to dialogues on a range of significant challenges and opportunities facing the FSC at this juncture.

We are writing to raise several concerns that have arisen in recent months which we believe have the effect of reducing the credibility of the FSC among its supporters, communities affected by forest operations, and within the marketplace.

First, our experience has shown that the FSC Controlled Wood Standard has significant shortcomings that threaten on-the-ground results of FSC certification and the FSC brand. On two occasions in which RAN was centrally involved in the US and in Japan, FSC-labeled products containing fiber sourced from areas of social and environmental conflict would have reached retail shelves bearing the FSC logo were it not for RAN's intervention. The first case occurred with fiber sourced from Ontario and originated from the traditional territory of the Grassy Narrows First Nation, an area in which the First Nation had explicitly withheld consent for logging operations in their territory. The most recent case occurred in Japan and concerned fiber sourced from High Conservation Value Forests within Tasmania's ancient forests supplied by Gunns Ltd.

In both cases, RAN raised concerns about faulty risk assessments conducted by purchasers, and in both cases our actions resulted in the removal of the contentious fiber. While these outcomes were ultimately favorable and demonstrate one of the advantages of the FSC system, the reliability of the Controlled Wood Standard should not depend on challenges to products from ENGOs or other stakeholders but should catch such high risk cases as part of the controlled wood audit process. Our experience leads to the question: What other FSC-labeled products now in retail circulation contain wood fiber from similarly dubious sources? We look forward to the opportunity to present these issues to the FSC and contribute to FSC policy efforts which can prevent their continued recurrence.

Our second area of concern stems from a widely-circulated allegation that a majority of FSC certified timber is sourced from "ancient forest regions." RAN is committed to protecting ecological integrity and defending human rights as well as stopping catastrophic climate change. We see the conservation of intact and old growth forest ecosystems as fundamental to our mission and thus find the certification of logging in such forests extremely challenging. The ecological importance of prioritizing protection of these forests has never been higher, and negotiations under the Climate Convention are creating the possibility of new conservation tools that can retire such logging rights and protect these forests from further industrial logging.

RAINFOREST ACTION NETWORK

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Critics of RAN's membership in the FSC are alleging that "at least 60% of FSC timbers are sourced from first time industrial logging of ancient forests". In reviewing the FSC web site we have found it very difficult to ascertain the veracity of this claim. Therefore, we ask the FSC to respond to this claim by providing accurate data regarding the percentage of FSC timbers derived from primary (never industrially managed) and old-growth (older than 200 years) forests.

RAN's reputation and effectiveness in using the FSC as a change agent in the marketplace depend on the FSC's ability to deliver ecological integrity. We appreciate your attention to this issue and look forward to meeting you and discussing these and other matters at the upcoming General Assembly meeting.

Sincerely,

Jennifer Krill
Program Director
Rainforest Action Network

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