

Dear Kim and FSC directors,

We, the undersigned, are writing as FSC environmental, economic and social chamber members, supporters and certificate holders to express our concerns about truth-in-labeling in the FSC system.

FSC's mission is to promote the responsible management of the world's forests. When PEFC puts its label on the products of status quo forest practices that cause environmental and social harm, we do not consider it responsible – in fact, many FSC supporters say that PEFC is guilty of greenwashing. But under FSC, the products of status quo forestry – e.g., timber from PEFC-certified forests and uncertified forests – are routinely designated as Controlled Wood and incorporated into FSC Mix products.

We understand that the changes in FSC CoC and labeling that resulted in FSC Mix and Controlled Wood have in the past been important to growing both the supply of and demand for FSC products, that this has increased trade and brand recognition of FSC products, and the net result has been expansion of the area of forests and plantations managed to FSC standards worldwide. But many of us have seen and continue to regard FSC Mix and Controlled Wood as unfortunate stopgaps that we would like FSC to get away from over time. Ideally, all production forests would be managed to FSC's high standards and all certified products would be FSC 100%. For this to happen, FSC Mix products will have to gradually give way to FSC 100%.

We are deeply concerned, therefore, that the recent trend in FSC product labeling and the underlying production and market share of FSC-certified products appears to be in the opposite direction.

No one knows exactly what percentage of FSC products manufactured globally are Mix vs. 100%. At the 2011 General Assembly, the FSC membership passed motion #47 directing FSC to complete a study that would have yielded this data. Unfortunately, this motion has not yet been implemented.

There is ample anecdotal evidence, however, suggesting that FSC manufacturers around the world have been migrating en masse to Mix and that the relative proportion of FSC 100% products has been decreasing.

In the FSC system currently, there is no internal mechanism that would encourage the reversal of this trend. There is risk that many FSC manufacturers will park themselves at the lowest common denominator of the system, and that over time this will hamper the continued growth of forest management certification.

We believe that one important solution to this set of problems lies in the promotion of the FSC 100% label and more accurate communication about the FSC Mix label and what it does, and does not, stand for.

FSC 100% are the only products that originate entirely from forests managed to FSC standards. FSC 100% is the gold standard within the gold standard.

FSC Mix products can incorporate any mixture of FSC-certified, Controlled Wood and reclaimed inputs, but due to the nature of FSC CoC and the credit system, all of their contents may in fact be Controlled Wood. For FSC Mix products, the direct link between certified products and the forest is broken. Because of this, and also the fact that Controlled Wood is a risk-based due diligence system that offers much weaker assurances than does the on-site, performance-based auditing of forest management certification, FSC Mix represents a much lower performance standard than does FSC 100%.

FSC 100% products are readily produced by small manufacturers of lumber and value-added solid wood products, including community-based operations in the tropics and elsewhere, while FSC Mix lends itself to the manufacture of fiber-based and assembled wood products that are often made by larger manufacturers. Finding ways to promote FSC 100% and properly distinguish it from FSC Mix is therefore also an unexplored pathway for increasing the value of FSC certification to smaller producers.

And yet, today FSC labels and communications obscure or downplay the important differences between the two. A factsheet on “Using FSC logo and labels” on the FSC website says that the FSC logo and on-product labels “guarantee that products come from responsible sources which support the conservation of forests and wildlife, while helping people to lead better lives.” And the tagline on the FSC Mix label reads simply “From responsible sources.”

In the meantime, all across the public domain – in countless articles, websites, promotional brochures, and blogs – one reads that FSC-certified products come from certified forests. If it were researched, we strongly suspect that the great majority of consumers who recognize the FSC logo think that this is what the FSC Mix label stands for.

To maintain its status as a leader in forest products certification and maintain its integrity, FSC needs to hold itself to the highest standards of truthfulness, accuracy, and disclosure. Therefore, we call on you as leaders of FSC to consider the following steps:

1) Make a plan and set a firm schedule for implementing motion #47. FSC needs reliable data on the production and relative proportions of FSC Mix vs. 100% products in order to plan and act effectively.

2) All official FSC communications throughout the network should be vetted so that it's clear that only FSC 100% products are verified as originating from responsible forest management. At the same time, even if Controlled Wood is dramatically improved, as we hope it will be, it will not rise to the FSC's standard of responsible forestry, which is forest management certification. Therefore, FSC should immediately stop saying the contents of FSC Mix are from "responsible sources" as this is clearly not truthful and misleads consumers to believe that the product originates from FSC-certified forests.

3) The strategic plan should establish a strategy and a firm schedule for promoting FSC 100% and encouraging companies to transition from Mix to 100%. It should also state an unambiguous goal of gradually reducing the system's reliance on Controlled Wood, and identify additional enforceable mechanisms (such as implementing and supporting the uptake of the Modular Approach Programme) for accomplishing this goal.

4) It should be FSC's official policy to develop and support market drivers for FSC 100%. FSC's communications and brand positioning need to clearly differentiate 100% and Mix, consistently elevating the former without either overselling or devaluing the latter. An analogy would be the LEED green building rating system, which promotes the overall value of LEED certification but offers different levels of recognition and performance within the system (LEED Certified, Silver, Gold and Platinum).

5) The FSC trademark standard will be revised starting in 2015. This is an opportunity to begin addressing the problems raised above. The tagline on the FSC Mix label should stop saying "wood from responsible sources" and instead say something like "supporting responsible forestry".

We, the undersigned members and stakeholders from all Chambers, look forward to a constructive dialogue with other stakeholders and the leadership of the FSC so we can work together to improve the credibility and truthfulness of the FSC labels and ready the FSC to take on the future challenges as a frontrunner in the global market for certified products.

* FSC Organizational Member
** FSC Individual Member
† FSC Certificate Holder

Environmental - North

Jason Grant
Greenwash Action

Judy Rodrigues
Greenpeace *

Jens Holm Kanstrup
Forests of the World *

Caroline Pufalt
Sierra Club *

Sean Cadman **
Australia

Dr. Leonie van der Maesen
Friends of the Earth Australia *
Friends of the Earth Western Australia *
Friends of the Earth Netherlands *
Western Australia Forest Alliance *

Bill Barclay
Rainforest Action Network *

Warrick Jordan
The Wilderness Society (Australia) *

Jess Abrahams
Australian Conservation Foundation *

Jonathan La Nauze **
Australia

Debbie Hammel
Natural Resources Defense Council *

Patrick Spencer
Cork Forest Conservation Alliance *

John Palmer **
Canada

Greg Hall & Susie Russell
North East Forest Alliance *

Sandra Ball
Milieudefensie *

Ian Redmond
Born Free Foundation *

Environmental - South

Lincoln Quevada **
Bolivia

Pedro Gonzalez
Fundecor *

Social - South

Jaime Levy
Altropico *

Cosmas Makamet
FORCERT Ltd. *

Luis Astorga
Agrupación de Forestales por el Bosque Nativo

Andrés Venegas S. **

Bhishma Subedi
ANSAB *

Dr. D.P.S. Verma **
India

Juan Carlos Ocampo **
Member of the Permanent Committee of Indigenous Peoples
Nicaragua

Sergio Madrid
Consejo Civil Mexicano/Silvicultura Sostenible *

Doralice Ortiz
Corporación Aldea Global *

Pedro Gonzalez **
Costa Rica

Social - North

Alan Smith **
Germany

Christoph Wiedmer
Society for Threatened Peoples – Switzerland *

A.A. van Wijngaarden **
Netherlands

Hubert Kwisthout **
United Kingdom

Economic - North

Guido Fuchs **
Switzerland

Ross Yeager
Magellan Group Ltd. * †

Roland Offrell
Skånsk Landskapsvård AB * †

Peter Hayes **
Hyla Woods †
USA

Economic - South

Peter Dam **
Papua New Guinea

Glenda Lee **
Guatemala

Lineu Siquiera Jr. **
Brazil

