

Concerns over Current FSC Certification of Plantations – an NGO Perspective

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I would like to begin by saying that the WRM is very happy about two things:

1) That a plantations review is under way. This is in itself very important, because it implies accepting that there are problems and that they need to be addressed. Which are those problems? How important are they? What are the solutions? Answering these questions will be up to the review, but this meeting constitutes a major step forward in the necessary direction.

2) We are also happy to see that this meeting –and we assume the review process- is open to organizations such as the WRM and others, that hold a critical viewpoint about plantations. This is a very positive sign in the sense that the FSC is seriously trying to address the problem.

It is important to highlight that when discussing about plantations there is always a great deal of confusion about what each one is talking about. It is therefore necessary to clarify the issue under discussion. Is it about small or large scale plantations? Is it about plantations aimed at the production of wood or about those aimed at forest restoration? Is it about plantations within agroforestry systems or about large-scale tree monocultures?

What the WRM and others are campaigning against is not about plantations in general. We do not oppose tree planting at all. We don't even oppose planting species such as eucalyptus or pines. Our opposition is focused on a specific type of plantation defined as large-scale tree monocultures that are not aimed at forest restoration (large-scale at the regional level, that is, the full extent of all the plantations in an area and particularly within a watershed).

While campaigning against that type of plantations we have confronted and unexpected problem: that the FSC is certifying the same plantations that local peoples and local NGOs are fighting against because of their negative social and environmental impacts. This weakens those local struggles and also weakens the credibility of the FSC.

So here both us and the FSC have a problem. It is not a minor problem, given that the FSC has already certified almost 6 million hectares of plantations.

We believe that the reason for this problem lies firstly in Principle 10, that enables many destructive plantations to be certified. We have produced a detailed critique of Principle 10 and the conclusion is that it allows for the certification of most large-scale plantations. The critique is included in our publication "Certifying the Uncertifiable. FSC certification of tree plantations in Thailand and Brazil" (available at <http://www.wrm.org.uy/actors/FSC/uncertifiable.html>) and I will therefore not go into the details here. However, I will just mention part of the wording of two criteria to show how vague they are.

For instance, criterion 10.3 states: "*Diversity in the composition of plantations is preferred, so as to enhance economic, ecological and social stability*". What does "preferred" mean? Criterion 10.4 says: "*native species are preferred over exotic species*".

in the establishment of plantations and the restoration of degraded ecosystems. Exotic species, which shall be used only when their performance is greater than that of native species". Here again is the word "preferred", which can be ignored if the performance of exotics (performance in terms of what?) is greater.

The second reason for the certification of destructive plantations has to do with on-the-ground implementation of certification. We have produced three detailed case studies (one in Thailand and two in Brazil), which prove the inadequacy of the assessments (also in "Certifying the Uncertifiable").

In the case of my own country (Uruguay), there are six certified plantations: four certified by the FSC and two under ISO 14001. Anyone knowing anything about the plantations debate in Uruguay knows that practically all the organizations campaigning against plantations are members of the Guayubira Group. However, none of the FSC certifiers contacted the Group. Only one certifier contacted me personally because a non-Uruguayan friend of mine provided her my name. This proves either the lack of knowledge about the local situation or a lack of willingness to identify and consult the relevant actors involved.

It is also important to note that none of the FSC assessments carried out serious studies on either social or environmental impacts and that even the ISO certifications –though also totally insufficient- provide more information on some issues than those carried out under the FSC. The fact that there is frequent information in the media regarding near-slavery working conditions makes matters even worse regarding FSC certification.

Perhaps a more interesting question than just looking at the negative impacts of plantations is to ask: do they have any ecological or social advantages?

What might be the ecological advantages of plantations?

From an ecological perspective, the larger the area of a forest, the better for the environment: it will contribute more to biodiversity and soil conservation and to a better regulation of the water cycle. The opposite occurs with a large-scale tree plantation: the larger the scale, the least ecological advantages it has. In fact, the more it expands, the more it depletes and pollutes water resources, it does not provide habitats for local fauna and flora and it impacts on soils.

It has been frequently stated that plantations relieve pressures from forests. If this were true, it would be an advantage. However, that hypothesis has been proven wrong in most countries and the fact that they impact negatively on grasslands and wetlands has not even been taken into account..

The second question is: what are the social advantages of plantations? The answer to this question needs to be focused at two levels: at the rural and urban levels:

1) At the rural level, plantations have no advantages. On the contrary, they expel people from the countryside. Even extensive cattle-raising –which generates very little employment- creates more jobs than plantations. This negative situation will be even worsened by the increased mechanization of harvesting operations.

2) At the urban level, the industrialization of wood from plantations has the capacity of providing more employment, except when wood is transformed into pulp, where modern pulp mills provide very little employment.

The main conclusion is that when comparing the ecological and social advantages of most large-scale plantations with their disadvantages, the balance is clearly negative. Therefore, we believe that many of the plantations that have been certified are in fact undermining the FSC's credibility while at the same time undermining local struggles against them.

Based on the above, we would like to contribute to your review with a set of recommendations that came out from our studies on certified plantations.

The main recommendation is that the FSC should suspend further certification of large-scale industrial tree plantations until this review is finalized. The FSC has already certified some 6 million hectares of plantations and it is time to take stock of the experience before moving further forward in plantation certification.

For the review itself we make three recommendations.

1) To carry out a general assessment of plantation certification including:

- Internal in-depth discussion of Principle 10 itself, which we believe to be largely responsible for the problems addressed in this book.
- Analysis of the political implications of FSC certification in countries where local peoples' movements are struggling against plantations.
- Analysis of the contradiction of FSC certification of plantations in countries where logging bans are in place or where local communities are struggling to implement such bans, and thus where FSC certification results in the undermining of local community efforts to protect forests.
- Analysis of why only large or very large plantations have been certified.
- Reflection on why certification of plantations has often counted against community forest management.
- Analysis of the negative relationship between certification of plantations on the one hand and, on the other, forest restoration and local peoples' livelihoods.
- Reopening of the debate on partial certification, which allows all of a company's operations, no matter how damaging, to benefit from the good publicity associated with certification of a part of those operations.

2) To carry out in-depth research on the social and environmental impacts of large-scale tree plantations, including:

- The impacts of plantations on land tenure and local peoples' access to land.

- The relationship between plantations and water resources.
- The impacts of plantations on biodiversity.
- The impacts of plantations on soils.
- The relationship between all of the above and the availability of livelihood resources to local people.
- The comparative virtues of plantations and community-based resource management.

3) To carry out independent studies on certified plantations that are being challenged by local NGOs and local communities, featuring:

Identification of a broad array of such cases.

Clear terms of reference for the research teams, ensuring that all social, cultural, political, economic and environmental issues will be addressed.

Clear guidelines regarding the composition of the research teams sufficient to ensure balance among all the necessary expertises and balance between plantation proponents and critics.

Prior consultation about all of the above with affected communities and local NGOs.

Adequate consultation, during the studies themselves, with all parties involved, with a special emphasis on affected communities.

Discussion of the research findings during the research process itself.

Implementation of measures to address the problems identified by the research.

Establishment of staff incentives ensuring that this research and any follow-up measures take account of the scientific and historical realities on the ground in each local area investigated.

As we state in the final paragraph of "Certifying the Uncertifiable":

"The WRM, the authors of this book and the Friends of the Earth partner organizations are open and willing to collaborate in the implementation of the above recommendations, particularly by accompanying FSC members to visit local communities affected by plantations and by providing them with relevant information on documented impacts of large-scale tree plantations."

And we are really willing to do so.