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Imaflora and certification of forest plantations

In response to the public letter recently released by WRM (World Rainforest Movement) and signed by other social movement organizations, this is to clarify to the public Imaflora's activities relative to certification of forest plantations.

[Imaflora](#) (Institute for Agricultural and Forest Management and Certification) is a nonprofit civil organization committed to promoting changes in the forest and agricultural sector in order to achieve conservation and sustainable use of natural resources and generation of social benefits. We value transparency, honesty and consistent action. We respect social, cultural, environmental and economic diversities, and their respective complexities. We believe that responsible agricultural and forest management and cattle raising production contribute to the conservation of natural resources and socioeconomic development. We use independent, voluntary and non-discriminatory certification as a tool to promote desired changes in the forest and agricultural sector.

We believe that FSC is an organization capable of promoting responsible forest management worldwide. As representatives of the NGO Rainforest Alliance we have been acting as certification body in Brazil since 1997. We are FSC members since its foundation in 1993. Furthermore, we believe that on the basis of a multi-stakeholder governance structure, this certification system allows all groups of the society that are affected by or interested in the forestry sector to participate in the decision-making process. Transparency and public participation mechanisms, in addition to a set of technical criteria of the FSC forest certification system, allow the evaluation of the socio-environmental performance of the companies applying for certification.

Imaflora does not share the opinion that FSC should no longer certify large-scale forestry monocultures. On the contrary, we do believe that FSC certification for companies in this sector is potentially transformative, especially when it comes to securing rights and proper working conditions, good relationship among community members and respect for traditional rights, as well as the adoption of forest production practices that reduce impacts on fauna, flora and water resources, and protect high conservation value sites. We made a [study](#) in partnership with the University of São Paulo to evaluate FSC certification impacts on forest plantations, and we are committed to regularly monitoring such impacts. Moreover, we believe that continuous certification process, which includes periodic monitoring and permanent public consultation procedures, as well as annual public reports, may improve the transparency and social control over the socio-environmental performance of certified companies.

FSC certification standards and policies may apply to any forest management operation in the world, including the Brazilian companies engaged in monoculture eucalyptus plantations for the production of paper and pulp. Imaflora is member of FSC and participates in the formulation of these standards and policies, but it is not responsible for them and has no authority to amend them according to their applicability in a given situation. As Rainforest Alliance's representative and certification body in Brazil, Imaflora is in charge of assessing, on an objective and technically consistent basis, the compliance with these standards and policies. The companies that are able to provide evidences about their compliance therewith are recommended by Imaflora to receive FSC forest certification and use FSC seal on its products accordingly.

Imaflora also acknowledges the FSC system limitations. FSC forest certification allows consistent forest management as defined under FSC certification standards and policies, but this is not enough to solve all socio-environmental problems of an organization or the area in which it operates. Local actors or stakeholders should have no expectations that an FSC certified organization will not have - or has never had - socio-environmental problems.

FSC certification and certified forest companies do not replace local and state government authorities in the role they play as regulatory bodies for private activities or in promoting socio-economic development. Government authorities play a



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fundamental role, especially in areas that lack social support, and FSC certification program is not supposed to evaluate or affect the performance of their duties in the areas in which certified companies are located. Nevertheless, the FSC system application should not be restricted to those areas where government authorities effectively perform their duties, because this would be understood as discrimination and FSC would then operate predominantly in developed countries. The role duly organized civil society plays in the daily relationship with private companies and local government authorities is also of utmost importance for the socio-economic development in those areas.

The certification assessment process evaluates the current status of the organization's compliance with all FSC [Principles, Criteria and Indicators](#), and [policies](#), as well as future perspectives on its socio-environmental performance and feasible long-term forest activities. The organization's previous problems and history are important elements to be assessed by Imaflora, but they will only prevent certification if it is duly evidenced that these problems represent, on the assessment date, non-conformances under FSC standards and policies. This important rule allows and encourages companies to improve their performance over time and achieve FSC certification once P&Cs are met. The only exception provided for in the FSC system is the cut-off date of 1994 for the conversion of forest areas. After such date, converted areas under the responsibility of an organization undergoing assessment process cannot be certified by FSC.

Another specific issues mentioned in WRM public letter, especially problems related to: i) water shortage caused by eucalyptus plantations; ii) labor problems; iii) territorial rights; iv) compliance with environmental laws and licensing; and v) community relationships are part of the assessment currently carried out by Imaflora at Fibria, Veracel and Veracel's landowners assistance partners and have been duly assessed by the audit team. Imaflora's conclusions about such issues will be included in the public reports on each of the foregoing processes once they are closed. The reports will be available at [FSC website](#) and may also be accessed at [Imaflora website](#).

Finally, we would like to express our respect for the organizations that signed the letter and their position against FSC certification for large-scale forest plantations. We also respect the fact that such organizations do not share our institutional requirements and, therefore, have decided not to participate in the dialogue with Imaflora in public consultation procedures for assessing and monitoring FSC forest certification. Yet, we are always interested in maintaining the dialogue with any organization that is willing to express its concerns about Imaflora's certification procedures. We believe that it is only through dialogue that we can find solutions for problems that prevent sustainable development.

Every comment is relevant, and specific issues - which are part of the scope of FSC standards and policies - concerning the performance of the companies assessed by Imaflora will be duly evaluated based on field assessment and answered in the public certification reports.

Comments on this letter should be sent to Leonardo Sobral, Imaflora's forest certification manager (leonardo@imaflora.org). Comments upon and complaints against certified companies or companies undergoing certification process should be sent to qualidade@imaflora.org.