FSC:

Unsustainable Certification of Large Scale Tree Plantations

WORLD RAINFOREST MOVEMENT

International Secretariat
Maldonado 1858, Montevideo, Uruguay
Tel: +598 2 413 2989, Fax: +598 2 418 0762
E-mail: wrm@wrm.org.uy
Web site: http://www.wrm.org.uy

Northern office
1c Fosseway Business Centre, Stratford Road,
Moreton-in-Marsh, GL56 9NQ, United Kingdom
Tel: +44.1608.652.893, Fax: +44.1608.652.878
E-mail: wrm@gn.apc.org

Published in September 2001

This publication was made possible with support from NOVIB (The Netherlands) and the Swedish Society for Nature Conservation.

-

Index:

About this book:

This book includes a selection of articles published in the World Rainforest Movement's (WRM) Bulletin on the issue of Forest Stewardship Council certification of tree plantations.

The level of detail and analysis varies from article to article due to the bulletin's character, which aims at being a useful tool both to people and organizations working at the local level and to those who work at the international level. In spite of that, we decided not to omit any article, in the belief that all of them can help to raise awareness on the problems involved.

The authorship of the book is shared by Ricardo Carrere, Chris Lang, Noel Rajesh, Larry Lohmann, Wally Menne and by the numerous people and organizations who sent us relevant information on the issue. The WRM assumes responsibility over the mistakes that might have been made.

The FSC should review plantation certification

A troubling fact has come to our attention: an increasing number of large-scale tree monocrops are receiving Forest Stewardship Council (FSC) certification throughout the world.

Among the plantations recently given a “green” stamp of approval are Shell's plantations in Argentina, Chile, Paraguay and Uruguay; SAPPI’s, MONDI’s and SAFCOL's in South Africa; Klabin’s and V&M Florestal's in Brazil; Perum Perhutani's in Indonesia; Fletcher Challenge's in New Zealand/Aotearoa and many others. If this trend continues, many more tree monocultures will also be guaranteed "sustainable" by the FSC, an organization which enjoys great credibility among the public.

The FSC was created as a result of increased awareness by consumers about their role in forest destruction, resulting from successful NGO campaigns, particularly regarding unsustainable logging practices in the tropics. When consumers began to ask their suppliers for certified wood, a number of NGOs decided to promote a process which could give them the choice of a “green” product. The NGOs came up with a number of principles and criteria that they insisted should be met before an FSC certificate was granted.

Nine of those principles are focused on forests and one on plantations (number 10). We believe that it is this decision --to allow large-scale monoculture plantations to be certified along with other forestry operations-- which lies at the root of the current disturbing trend. People throughout the world are increasingly aware that plantations are not forests. Numerous local communities and organizations have documented the impacts of large-scale plantations and opposed them because of their social and environmental impacts. The plantations in question have resulted either in deforestation or in the degradation of other ecosystems, particularly grasslands and wetlands. On the ground reality is showing that large-scale tree monocultures --no matter how many mitigation measures are implemented-- inevitably result in large-scale impacts on water, soils, flora, fauna and people because of their sheer scale.

Even if one accepts --which we don't-- that plantations are forests, the fact is that Principle 10 is so weak that most plantations --with the exception of those in areas marked by land conflict-- can be declared “sustainable” and given FSC certification.

We do not pretend to challenge the FSC and even less to question our NGO friends involved in it. What we do request is for them to revisit the whole issue of plantation certification, to take into account the plentiful existing documentation regarding the basic unsustainability of the plantation forestry model and either to exclude plantations from FSC certification altogether or to modify substantially Principle 10.

The FSC's main strength is its public credibility. Certification of unsustainable forestry operations --such as large-scale tree monocultures-- can erode this credibility. A critical review of its own principles by the FSC can only increase it. We sincerely hope that the FSC will be able to accomplish the latter. (Special bulletin, February 2001)

Articles on specific countries

Aotearoa/New Zealand: A challenging certification
by Chris Lang, e-mail: chrislang@t-online.de

In October 2000, all of Fletcher Challenge Forests' New Zealand plantations received Forest Stewardship Council certification, after an evaluation carried out on behalf of Scientific Certification Systems (SCS). Included in the certification is the world's largest continuous radiata pine plantation.

Ian Boyd, Fletcher Challenge Forests' then-Acting Chief Executive, said, "Forest Stewardship Council Certification will provide Fletcher Challenge Forests with a significant marketing opportunity in those markets which demand environmental responsibility."

However, the certification of Fletcher Challenge Forests' operations raises serious questions about SCS' assessment process, as well as about Fletcher Challenge Forests' plantation management itself.

According to FSC principle 6, all World Health Organisation type 1A and 1B pesticides "shall be prohibited". Fletcher Challenge Forestry uses sodium fluoroacetate. Commonly known as 1080, it is a poison used to kill wildlife such as possums, which can damage plantation trees. In SCS' public summary of the assessment of Fletcher Challenge Forests' operations, the assessors acknowledge that 1080 is "a compound appearing on WHO Table 1". Yet, rather than refusing to award the certificate, SCS applied a condition which is so loose it is almost meaningless: "Within 12 months of award of certification, Fletcher Challenge Forests should be able to demonstrate that they are actively seeking alternatives to 1080, e.g. by supporting research into alternatives."

In other words, Fletcher Challenge Forests can continue to use 1080 without risking their FSC certificate, as long as they support research into alternatives. SCS does not mention what form such support should take, or even if it matters whether the research yields any results or not.

FSC principle 2 states that disputes over land rights "of a substantial magnitude . . . will normally disqualify an operation from being certified." To the Maori, land is sacred and they have several outstanding land claims on Fletcher Challenge Forests' plantation land under the 1840 Treaty of Waitangi. In their assessment, SCS' assessors describe the "uncertainty over ownership of a significant proportion of [Fletcher Challenge's] forest lands" as a "significant" issue. Once again however, this does not prevent SCS from awarding the certificate.

According to FSC Principle 6, "Use of genetically modified organisms shall be prohibited". Since 1995, Fletcher Challenge Forests has worked with Genesis Research and Development Corporation, New Zealand's biggest biotechnology company, on research into genetic modification of trees. SCS' assessors acknowledge that Fletcher Challenge Forests is involved in research on genetically modified plant tissues. Although Fletcher Challenge Forests does not currently use genetically modified trees in its plantations, rather than discussing whether Fletcher Challenge Forests' research conflicts with the spirit of FSC principles, the public summary of the assessment simply states: "All materials are classed as low risk and the laboratory is fully compliant with regulatory requirements."

In 1999 Fletcher Challenge Forests, Genesis, Monsanto, International Paper and Westvaco announced a

US$60 million joint venture. The joint venture company, called ArborGen, will produce and market genetically modified tree seedlings, focussing on radiata pine and eucalyptus trees in New Zealand. Monsanto has since withdrawn from active partnership.

Whether Fletcher Challenge Forests use the genetically modified seedlings in its own plantations or, as part of the ArborGen joint venture, sells them to other forestry operations, Fletcher Challenge Forests is effectively using genetically modified organisms, and promoting their use in forestry operations. Whether Fletcher Challenge Forests is therefore in breach of FSC's principles should surely be a matter for the assessors to discuss in the public summary of the assessment. Yet, in describing Fletcher Challenge Forests' research and development activities, the assessors conclude: "The company has a clear commitment to the FSC principles".

Three of the four assessors hired by SCS to carry out the assessment of Fletcher Challenge Forests' operations work for the New Zealand company Forest Research. In 1982, Forest Research hosted an international meeting on genetic research with radiata pine. By September 1995, the institute's greenhouses in Rotorua were stuffed full of genetically modified radiata pine. Forest Research also runs projects funded by Fletcher Challenge Forests. Could this perhaps explain the assessors' unquestioning acceptance of Fletcher Challenge research into genetically modified trees? (Special bulletin, February 2001)

Aracruz: the naked emperor

Because of Aracruz Celulose's move to apply for FSC certification for its eucalyptus plantations in the state of Bahia -avoiding at the same time the polemic issue of the dispossession of Guarani and Tupinikim's lands as a consequence of the company's plantations in the neighbouring state of Espirito Santo- a large number of concerned organizations and individuals held a seminar last October in Vitoria, Espirito Santo, to analyse this menacing scenario. Given that the certifying firm SCS had not complied with a number of FSC's requirements for participation and consultation, on October 22 they addressed a letter to the questioning the partial certification process and requesting the postponement of the consultation meetings.

The postponement of the firm's planned field audit during the first weeks of November shows that once again the certification process has been delayed, which seems to show that civil society pressure has been successful at least until now. Nevertheless, the fact that SCS has not given any answer to the letter is generating unrest. It remains unclear who decided to delay the process, what is the opinion of FSC-Brasil about the situation, and what is to be expected in the near future.

Resistance to Aracruz's activities continues. In Bahia, where the company wants the FSC-certification, various organizations are already registering in photos, videos, and interviews a number impacts of its activities. Various impacts caused by Aracruz plantations in Espirito Santo have already been documented and more work is being done in this regard. A new letter to SCS as well as to FSC-Brasil is also being prepared.

Within this framework, Aracruz continues trying to convince public opinion and authorities that its plantation activities do not cause any negative environmental impacts. At the end of November the firm received the visit of agronomist Almir Bressan of the Ministry of the Environment and biologist Pedro Burnier from the Ministry of Agriculture in its 286 hectare "micro basin" experimental plot in Espirito Santo,

where Aracruz is planning to double the actual plantation area of 175,000 hectares within a period of ten years. There the company has allegedly performed environmental impact assessments of eucalyptus monocultures on the hydrologic cycle and their relationship with neighbouring ecosystems, as the disappearing mata atlantica forest. According to Aracruz, the results of the hydrological balance control have shown that the hydrological deficit provoked by the eucalyptus plantation is similar to that registered in the mata atlantica forest.

What Aracruz does not say, however, is that the "micro basin" plot was only established in 1994 -when eucalyptus had been already planted on a massive scale in the region- thus disregarding that impacts on the local water resources had already began to occur before the beginning of this watershed experiment. It also states that its research has found very small differences between the water balance in eucalyptus plantations and that of neighbouring native forests. It does not, however, provide the information and only gives some figures for the year October 1995-October 1996. When information is specifically requested -as we did in 1997- the answer is that all the information is available ... at IBAMA in Brasilia! Aspects related to the scale of the project are not taken on board, since what has been allegedly proven for a small area can be totally inapplicable for 350,000 hectares, which is the total area that the company is planning to occupy with eucalyptus monocultures in the next ten years. Last but not least, it is important to remember that environmental impact assessments are never neutral. As a token of the latter, it is interesting to point out that the above mentioned Mr Burnier -who will be one of the people in charge of giving or denying the necessary permission for the extension of Aracruz's plantations in Espirito Santo- was one of the company's Directors until some time ago.

In spite of all its "micro basin" studies and its hired academics, the fact is that "macro basin" realities show a totally different picture. Anyone who visits the region accompanied by local people can see the numerous streams that have dried up -where they used to bathe and fish- can see the equally dried up wells and that even a river -the San Domingos- has stopped flowing. And that all this happened after Aracruz began planting eucalyptus. Aracruz is obviously trying to hide reality under a scientific dressing. But in spite of all its efforts, the emperor remains -as in the story- naked. (Bulletin 29, December 1999)

Will the FSC certify Aracruz Celulose's plantations?

The future credibility of the Forest Stewardship Council is at the crossroads. Aracruz Celulose, one of the largest tree plantation companies and the world's largest producer of bleached eucalyptus pulp has applied for FSC certification for part of its land holdings (95.500 hectares, of which 56.500 hectares of eucalyptus plantations), located in the state of Bahia, Brazil.

For those who have been following and supporting the struggle of the Tupinikim and Guarani indigenous peoples against this company, this may come as a major shock. After years of struggle the company -with support from the Brazilian security forces- imposed last year a "solution" on the indigenous peoples. But in spite of that, what remains undeniable is that Aracruz took over large areas of their territory and that the future of that imposed agreement remains uncertain. This has been recently very clearly expressed by the Tupinikim and Guarani in an "open letter to society" of 3 September 1999.

That is probably the reason explaining why the company is not yet applying for certification for its plantations in the state of Espirito Santo -home of those indigenous peoples- and has instead initiated the process in the neighbouring state of Bahia. If it succeeds in getting FSC certification there, then it will probably apply for the rest. However, social and environmental impacts of its large-scale plantations are

as well documented and local opposition is as strong in Bahia as in the state of Espirito Santo, so Aracruz will not have an easy task to get what it wants: certification from a credible organization such as the FSC.

Much will depend on whether the US-based certifier (Scientific Certification Systems -SCS) carries out a truly independent and participatory assessment or if it doesn't. If it chooses the former, then we are certain that Aracruz's plantations will not be certified. Unfortunately, its first steps have been -to say the least- worrying. More than 50 regional and local organizations and individuals have already complained in a letter addressed to SCS on 1 September 1999 for its non compliance with FSC-guidelines regarding stakeholder participation.

We believe that FSC members should monitor this process very closely, because the future credibility of certification in general and of the FSC in particular is at stake. Aracruz -the same as eucalyptus- is a symbol of a type of forestry which generates large scale negative social and environmental impacts. The same can be said about most -if not all- other plantation companies and about other tree species used in large scale monocultures. But Aracruz, whose history is one of occupation of lands of indigenous and other local peoples, of deforestation, depletion of water resources and the disappearance of local plants and animals, portrays itself as being environmentally and socially responsible. Obtaining FSC certification would be its final victory and would leave the door wide open for the certification of large scale plantations all over the world. Will FSC NGO members let this happen? (Bulletin 26, August 1999)

Brazil: FSC certification of Aracruz suspended

The news that giant bleached eucalyptus pulp producer Aracruz Celulose had applied for FSC certification had an enormous impact in the two Brazilian states -Bahia and Espirito Santo- where it operates. As a result, a large number of organizations and individuals concerned with the spread of extensive monoculture plantations in the region -which include those of Aracruz, Bahia Sul and Veracel- got together to prevent the company from receiving FSC approval.

The ensuing networking activities brought people together at a seminar which took place in Vitoria, Espirito Santo, on October 15-16. Participants included representatives from indigenous peoples organizations, NGOs, trade unions, fisherfolk, academics, Afro-Brazilian communities, journalists, parliamentarians and others. The seminar analized the impacts of the activities of Aracruz in the framework of the FSC principles and criteria and agreed to actively participate in the consultation process being implemented by the certifying firm SCS. Given that SCS had not complied with a number of FSC's requirements for participation and consultation, they decided to send a letter requesting the postponement of the consultation meetings. The letter was sent on October 22nd (available at http://www.wrm.org.uy/english/plantations/material/Aracruz/report1.htm) and to date (November 16) no reply has been received. FSC-Brazil has now informed that the certification process has been temporarily suspended due to the procedural deficiencies denounced by civil society organizations.

At the same time, the "agreement" imposed by Aracruz on the Tupinikim and Guarani indigenous peoples in the state of Espirito Santo is beginning to be questioned and on November 11, the indigenous peoples staged a demonstration to show their discomfort.

In spite of its enormous power, Aracruz is in a weak position. Knowing its record regarding indigenous peoples, it is trying to get FSC certification only for its plantations in Bahia, thus avoiding the issue of the

dispossession of indigenous peoples' lands in the neighbouring state of Espirito Santo. But even in Bahia, the impacts of plantations have shown to be so great, that it is highly improbable that it can be certified. For the FSC, its own credibility is at stake in this certification process. If Aracruz were to be eventually certified, most NGOs participating in the scheme would almost certainly withdraw, thus losing the necessary support to achieve credibility. (Bulletin 28, November 1999)

Costa Rica: the "green gold" bluff

Critics to tree plantations mostly refer to eucalyptus or pine monocultures and to their negative environmental and social impacts. Here we present a different case, based on interesting comments whose more relevant fragments we transcribe- we have received related to a recently published book on a teak plantation project in Costa Rica, written by Dr. P. Romeijn:

"An interesting new book is out: "GREEN GOLD - On Variations of Truth in Plantation Forestry". It methodically recounts the technical, legal, political and ethical aspects of a teak plantation established in Costa Rica by the Dutch company "Flor y Fauna", and its astonishing sequel of events.

The largest environmental groups in the world, the World Wide Fund for Nature (WWF) and one of the largest insurance and banking companies in the Netherlands, OHRA, soon became partners in the business. This seemingly odd trio went on to promote investments in the project as green and ethical, while making a parallel with investments in "Green Gold" due to its unusually high financial returns.

The returns offered to investors were based on "scientifically sound" and "conservative" production estimates of over 1000 cubic meters of commercial timber per hectare at the age of 20 years. Such figures, it was assured, were further based on 'local experience'.

Thousands of unaware citizens were convinced by the unparalleled investment campaign and the credibility derived by the endorsement of the project by the World Wide Fund for Nature, the participation of the insurance company OHRA, and the subsequent endorsement of the project by the Rainforest Alliance and the Forest Stewardship Council. 'WWF has ascertained that, in ecological and financial terms, the Flor y Fauna plantations set a worldwide example', read one of Flor y Fauna's advertisements.

Millions of dollars quickly poured into the project. The case was brought to the attention of the Dutch parliament, with statements of support by the Minister of Agriculture and the Minister of International Cooperation of the Netherlands. The project was referred to by OHRA as an example of "modern development aid" and as a mean to enhance forest conservation in Costa Rica.

The project became certified by the Rainforest Alliance as "well managed", based on the principles of forest management subscribed by the Forest Stewardship Council (FSC). The project was so appealing that the FSC publicly endorsed the certificate issued by the Rainforest Alliance, even though this organization had not yet been accredited as an official FSC certifier for plantations at the time.

A notorious public campaign was launched to incorrectly inform the public that the project had been 'certified by the FSC', an organization supported by a wide variety of environmental groups, and better known to the Dutch public than the Rainforest Alliance. Investments in the project continued to rise. It was later ruled by the Dutch Advertising Standards Committee that claims made in public ads were 'misleading'.

Dozens of similar Dutch plantation initiatives soon followed suit, most of them in Costa Rica, in attempts to cash in the overwhelming receptivity of the public for such visionary, exemplary, green and profitable investments. A dream come true.

But the dream was soon shattered. At the end of 1995, a couple of investigation reporters from the most reputable news commentary program on Dutch television, NOVA, dug out a confidential report on the project, commissioned a couple of years earlier by the head office of WWF-International to clarify the business arrangement between WWF-Netherlands, OHRA and Flor y Fauna. Among the report's astonishing conclusions were the following:

- WWF seems involved in a commercial operation with questionable technical, financial and ethical implications.
- It would be convenient to clarify if making exaggerated claims such as those referred to in this report is considered a violation of laws in the Netherlands.
- Expected yields "...exceed by a factor of 4 what are considered high yields for teak on good soil.
- This may be considered fraud.'

An additional and shocking embarrassment came when it was also exposed that WWF would be 'compensated' for its endorsement of the project with an estimated payment of 86 million dollars, '5% of the turnover of plantation section Teakwood VI', according to WWF-Netherlands. Teakwood VI refers only to the portion of the plantation established in 1993 alone: 750 hectares. Later on WWF also endorsed Teakwood VII and VIII, an additional area of 820 hectares, with alleged proportional 'compensations'. The total area planted by Flor y Fauna in Costa Rica exceeds 3.000 hectares.

In consecutive attempts to justify the unjustifiable, Flor y Fauna, OHRA, WWF and the Rainforest Alliance each time modified their previous position and arguments, falling in increasing contradictions, undermining their own position and credibility, and consistently molding 'the truth' to fit the arguments of the time. Therefrom the subtitle of the book: "On variations of truth in plantation forestry".

Investments in the project quickly came to a halt, while it was subject to the scrutiny of courts of law. Amongst those most seriously damaged from the exposure of the speculative and fraudulent internalities of the case were the World Wide Fund for Nature (WWF), individual investors, the credibility of both the Forest Stewardship Council (FSC) and the Rainforest Alliance, the reputation of the forestry profession in the Netherlands, and the reliability of forest investments in the tropics."

This case shows another aspect of the plantation model: that of commercial practices at odds with ethical standards aiming to attract unaware investors by showing them that plantations are not only a profitable but also a "green" business. A similar approach is that of plantation companies that promote investments in eucalyptus monocultures by small owners, promising them high revenues in a period of ten or twelve years, without taking into account the instability of the world markets. (Bulletin 21, March 1999)

South Africa: Quo vadis FSC?

by Wally Menne, e-mail: plantnet@iafrica.com

Certification of monoculture timber plantations as “sustainably managed forests” by the Forest Stewardship Council (FSC) makes an absolute mockery of the concept of sustainable environment and

ecosystem management.

In recent years vast tracts of industrial tree plantations in South Africa and many other countries, have been given the FSC stamp of approval.

How can this be possible? The natural vegetation in the areas where these plantations have been established was originally highly bio-diverse grassland or woodland. After conversion to plantations, these areas stand little chance, if any, of being able to revert to the natural climax vegetation type. The environment is subjected to a terrifying range of harmful impacts, starting with the construction of primitive roads and ending with huge, computerised mechanical harvesters compacting the soil, thereby destroying its function.

In between these environmentally catastrophic events, the land and its rightful inhabitants are subjected to an extensive suite of chemical, physical, biological and demographic alterations to their natural state. This all as part of the process that is imposed to meet the demands of first world greed for wood-fibre products:

1.- As a first step, the natural vegetation is either bulldozed or killed with herbicides to prevent competition with alien plantation trees for water, light and nutrients.

2.- Alien tree saplings are artificially fertilised to speed up their rate of establishment and other unnatural chemicals that absorb moisture are added to the soil to prevent the young plants from drying out.

3.- Spills of herbicides, insecticides, diesel fuel, engine oil and other human trash enter the natural environment without invitation.

4.- Alien invasive plants carried as seeds on vehicle tyres and worker's boots become established in the vacuum created by the destruction of the natural groundcover.

5.- Plantation contractors do not normally provide appropriate toilet facilities for their workers. Human faeces are deposited in the field, leading to pollution of streams, rivers and lakes with bacteria such as that which causes cholera. The recent cholera outbreak in the eastern region of South Africa could well have originated from this source.

6.- Contract workers are poorly paid and have little choice but to build makeshift homes within areas of natural forest near the plantation sites where they work, causing substantial ecological damage in the process.

7.- Animals and birds that are disturbed by the plantation establishment activities either flee the area or are hunted and snared as food for the contract workers.

8.- Local people who would have had access to the area if plantations had not been established, could have used the area to graze their cattle and sheep, harvest thatch grass for roofing their homes, and collect food and medicinal plants for their own limited use. They are now deprived of this resource and are forced to move into previously undisturbed areas in search of these commodities. This often leads to conflict with the management of protected natural areas.

9.- Surface water in the vicinity of new plantations is soon depleted and is usually only evident during the

rainy season. People have to turn to the use of boreholes and wells that often are saline, or polluted with bacteria from pit toilets.

10.- Timber plantation contract workers are commonly unmarried men from other parts of the country and to a large extent from neighbouring countries. This can often lead to the problem of women in local communities being sexually harassed. Outcomes of this situation include unwanted pregnancies, sexually transmitted diseases and destroyed relationships. There is a high likelihood that the increasing incidence of HIV infection in the rural areas of KwaZulu-Natal (KZN) can be attributed in part to the employment practices of the timber plantation industry.

11.- Contract workers add a new dimension to local health care needs. Those that are recruited from remote rural parts of neighbouring states can be carriers of diseases such as malaria and tuberculosis. Coincidentally both these diseases have been increasing proportionately during the period that industrial timber plantations have been expanding (over the last 15 to 20 years).

12.- The loss of beneficial soil organisms in timber plantations has been well documented. Monocultures are inherently prone to the rapid spread of pathogens. Natural buffers that are present in bio-diverse ecosystems cannot be replicated in the timber monoculture environment.

13.- The establishment of timber plantations upsets the natural balance of species. These plantations create barriers that disrupt the normal migration and breeding patterns of birds, animals and insects.

14.- Community food security is one of the first victims of timber plantations. Areas used traditionally for growing fruit and vegetables become too dry or are shaded out when plantations are established too close to the fertile areas along streams and rivers. The remaining residents are left in a position where they have to use their limited financial resources (usually state pensions) to buy processed food from trading stores.

15.- Transport systems, especially roads, are subjected to high levels of usage for which they were not designed. The cost of upgrading or maintaining rural roads is usually borne by the state, which means that the timber industry benefits from an indirect subsidy.

16.- Negative effects on non-timber neighbouring farms are numerous. In much the same way as genetically engineered food crops will pollute fields of nearby non-GMO or organic crops, there are off-site impacts that undermine the economic viability of other farmers. These include an increase in alien invasive plants, loss of ground water, increased crime and poaching and the disruption of normal pasture management by burning, due to the risk of fire spreading to the timber plantations,

Large-scale timber plantations destroy whole ecosystems and rural economies. For some strange reason this calamity is virtually ignored by governments and research institutions. The onus should be on an organisation like FSC to insist that thorough, impartial research is conducted before certification can be considered.

In place of the natural landscape is a new visage dominated by fake forests. Fake not only in that their owners pretend that they can substitute meaningfully for the real thing, but truly fake in terms of how their economic benefits are exaggerated and inflated at the local level.

There is no doubt that a consumer commodity like paper, or pressboard, has great value in modern

society. What is not acceptable is that the rate of consumption of paper products is increasing whilst the living standards of poor communities where the timber is produced do not. The growth of the throwaway culture of so-called developed countries has a direct correlation to the eroding natural environment, and standards of living in the countries that have been colonised by the tree plantations of the multinational corporations concerned.

The FSC must take a large share of the responsibility for this social and environmental injustice.

Plantations are not forests !!! (Bulletin 45, April 2001)

South Africa: Something appears to be wrong

South Africa is perhaps the country when the contradictions about FSC-certified plantations stand out most clearly. Of the three major plantation companies, two of them have large areas of certified plantations: Mondi has 431,301 hectares and SAFCOL 271,362. The third company (SAPPI) is following the same policy and has begun the certification process with an initial 48,507 hectares certified. In total, 828,128 hectares of plantations have until now received the FSC stamp of approval --all certified by the UK-based SGS Qualifor-- and more will follow.

However, those same plantations are being opposed by a broad number of individuals and organizations in South Africa because of their environmental and social impacts. Many people were driven off the land --particularly during the Apartheid period-- to make way for those plantations and received no benefits from them. Plantation species have not only occupied 2 million hectares of fertile lands, but have also invaded another 2 million hectares through spontaneous seed dispersion. Both plantations and invaded areas have resulted in strong negative impacts on supplies of water --a scarce resource in South Africa-- and therefore on people and biodiversity.

South Africa is a megabiodiverse country and most of the flora and fauna is not located in forests but in grasslands and wetlands. The country has always had a relatively small area of forests. None of the plantation companies can therefore be accused of having caused deforestation. However, they can certainly be accused of having degraded enormous areas of the country's dominant ecosystem --grasslands-- which constitutes the support for its very diverse and unique wildlife and flora.

The contradiction is therefore clear. On the one hand, a certification firm --accredited to the FSC-- is telling the public that these plantations are sustainable. On the other hand, local networks such as Timberwatch have been created to oppose those same plantations because of their basic unsustainability. Something appears to be wrong and the FSC should look more closely into this matter. (Special bulletin, February 2001)

Thailand: State-owned forestry industry fuels controversy with forestry certification
by Noel Rajesh, e-mail: terraper@comnet.ksc.net.th

Thailand's main logging agency, the state-owned Forestry Industry Organisation (FIO), is looking to certification of its tree plantations and ecotourism as a way out of its financial troubles as well as to cover-up its infamous past.

Founded in 1947 as a state-owned forestry enterprise with the mandate to manage logging concessions in Thailand's forests, the FIO operates under the Royal Forestry Department (RFD) in the Ministry of Agriculture and Cooperatives. At the time of its establishment, the agency had three main operations: logging of teak and non-teak tree species in concession areas; logging in non-concession areas that include the sites of proposed reservoirs and dams, and the use or sale of confiscated wood cut or imported illegally into Thailand.

In 1988, the agency had a total income of US$37 million and annual profits of about US$4 million. But in 1989, the Thai government declared a nation-wide ban on logging concessions, depriving the agency of logging opportunities in natural forests. With declining logging revenues, the agency had accumulated debts of about US$11.6 million by early-2000.

Over the years, the FIO has been involved in a number of controversies over its logging plans and activities. One of the most controversial was the FIO plan to clearcut 24,000 hectares of old-growth pine forests in Ban Wat Chan in Chiang Mai province in north Thailand in the early 1990s. The plan was eventually cancelled after strong opposition by 4,000 Karen ethnic communities who had lived in the area for more than 100 years and were concerned about the impacts on their livelihoods from the logging of their watershed forests.

In 1994, police investigating logs found in a protected forest area in Thailand discovered that the wood belonged to the FIO, and brought charges against the agency, alleging that it was involved in illegal logging practices.

In the post-logging ban era, apart from the auction of illegal timber, the FIO has focused on commercial tree plantations and timber processing. Presently, the agency has a total of 160,000 hectares of tree plantations, mainly of teak, rubber, and eucalyptus. The FIO owns also three sawmills for processing teak and non-teak tree species and for producing furniture, doors and windows for the local market. Apart from these sawmills, the FIO is the majority shareholder in the Thai Plywood Company that was set up as a separate company under the FIO to undertake wood production.

The agency plants commercial tree species such as teak and eucalyptus on large areas of "degraded" forest, which are often areas of forest degraded by logging concessions granted by the FIO and the RFD. The agency uses the labour of the village people near its plantation areas to secure a continuous supply of timber from its tree plantations.

Since the 1980s, Thailand's local communities have strongly opposed large-scale tree plantations --particularly of eucalyptus-- that expropriate village farmlands and replace common forest areas, lead to water scarcity and soil erosion. Since 1996, many communities in northeastern Thailand have also succeeded in forcing the government to remove the eucalyptus trees and return the lands for village farming and recovery of community forests. Some of these areas include the FIO's eucalyptus plantations.

But remaining oblivious to the controversy over its industrial tree plantations, the FIO plans to establish 240,000 hectares of commercial tree plantations of teak, eucalyptus and other species throughout Thailand. Presently, the FIO is looking to the certification of its timber and forest products as a long-term solution for its financial problems.

It has chosen two teak plantations totalling over 320 hectares in Kanchanaburi and Phitsanulok provinces

for “certification”. SmartWood, a not-for-profit environmental group accredited by the Forest Stewardship Council (FSC), is undertaking the certification process. FSC certification would enable the FIO to obtain access to markets in industrialized countries seeking timber from “sustainable” and “well-managed” sources.

From 1-7 October 2000, a team from SmartWood visited Thailand in order to assess the two FIO plantations. SmartWood will write up a report and decide whether or not the two plantations can be certified by the end of 2000. If the accreditation is successful, the FIO plans to extend it to all of its 138 tree plantations in the next five years. Presently, SmartWood has submitted its report to the FIO for clarifications from the agency. FIO expects that certification will be successfully completed by the end of the year.

Whether controversies and scandals relating to the FIO’s previous logging and plantation projects would figure in the assessment, Mr. Jay Blakeney, the leader of SmartWood’s FIO tree plantations assessment team, said: “SmartWood assessment is usually focused at the forestry management unit. The system of assessment doesn’t look at the historical and other institutional mistakes.”

Meanwhile, the FIO has been drafting a management plan with SSC Natura (Scandiaconsult Natura, formerly Swedforest International AB), a Swedish forestry consultant company since 1993. Supported by a Swedish government grant of US$400,000, the management plan envisages the FIO entering the ecotourism business. The FIO would seek funding for its ecotourism plan from the Japanese Bank for International Cooperation (JBIC) that will be used to create jobs in protected forest areas designated for tourism.

In cooperation with the Thailand Authority on Tourism (TAT), the FIO has already begun to build four ecotourism centres at US$3.3 million each, one of which will be located in the Ban Wat Chan forest. Local communities and concerned NGOs in Ban Wat Chan have voiced concerns that the ecotourism plans threaten the Ban Wat Chan watershed forest. The village people have stated that the expansion of roads in the hilly and forested terrain is increasing soil erosion and forest degradation.

While the FIO’s plans for logging, ecotourism and tree plantations continue to threaten the natural forests and the livelihoods of local communities in Thailand, the certification of its tree plantations, in effect, would assist the FIO in delaying meaningful structural changes. After certification, the agency will continue to seek revenue from destructive logging operations and large-scale monoculture tree plantations. Subsequently, framing “guidelines” for plantations management or the certification of “sustainable” logging practices are wholly inadequate in halting the FIO’s continued degradation of natural forest ecosystems and the destruction of local community livelihoods. Challenging the FIO therefore involves challenging its ideological approach that is based on an inherently flawed “science” of forest management which dismisses the complexity of natural ecosystems as well as the livelihood requirements of ethnic and local communities that depend on them. (Bulletin 41, December 2000)

Forest Stewardship Council (FSC) certifies Thailand’s chief logging agency
by Noel Rajesh, e-mail: noelrajesh@yahoo.com

In July 2001, Thailand’s chief logging agency, the state-owned Forestry Industry Organisation (FIO), received “sustainable management” certification of two teak plantations. Undertaken by SmartWood, a forest management certification organisation that is accredited by the Forest Stewardship Council (FSC),

the certification would help solve the agency's financial troubles as well as cover up its infamous past.

The Swedish International Development Cooperation Agency (SIDA) that provides aid to developing countries supported the FIO's certification process by funding SCC Natura (formerly Swedforest International AB), a Swedish forestry consultant company, to develop a business management plan.

The FIO was founded in 1947 as a state-owned forestry enterprise with the mandate to manage logging concessions in Thailand's forests. In the past, the FIO has been caught up in controversies about dubious logging and plantation projects as well as mounting debts. By the late 1990s, the agency had accumulated nearly US$12 million in debts after the Thai government declared a nation-wide ban on logging concessions in 1989 that deprived the agency of its logging revenues.

The FSC-approved certification of the FIO's plantations would provide a lifeline to the struggling agency by assisting the sales of "certified" timber to markets in Europe and North America seeking timber from "sustainable" and "well-managed" sources. The certification would also support the ongoing efforts of the agency to remake its image as a "sustainable" forest management agency.

The FIO has a total of 160,000 hectares of tree plantations, mainly of teak, rubber and eucalyptus. The FIO also owns three sawmills for processing teak and non-teak tree species.

Winai Subrungruang, FIO's managing director, said that the FIO had been practicing "sustainable forestry management" since 1997 on teak plantations covering 2,880 hectares (ha) in Phitsanulok province and 2,480 ha in Kanchanaburi province.

Winai said that the FSC certificate was valid until May 2006; the FIO has plans to obtain certification for all its 134 tree plantations.

FIO's newly acquired "sustainable" forest management image, however, falls apart under close scrutiny of the agency's notorious past.

One of the most controversial FIO projects in the past was to cut 24,000 hectares of old-growth pine forests in Ban Wat Chan in Chiang Mai province in north Thailand in the early 1990s. The Ban Wat Chan pine forest is the largest area of indigenous pines in Thailand and comprises the main watershed of one of the main rivers --the Mae Chaem River-- in north Thailand. The government eventually cancelled FIO's logging plan in end 1993 after strong opposition by 4,000 Karen ethnic communities who have been living in the area for more than 100 years who were concerned about the impacts on their livelihoods from the logging of their watershed forests.

In 1994, the FIO faced charges of illegal logging after police found logs in a protected forest area in Thailand and discovered that the wood belonged to the FIO. The amount of logs imported from Burma appeared to exceed a quota agreed to between the FIO and the military dictatorship in Burma.

Witoon Permpongsacharoen of the Bangkok-based environmental group, Towards Ecological Recovery and Regional Alliance (TERRA), stated that the FIO's operations such as the auction of confiscated wood actually help to increase illegal logging in Thailand. "The logging companies can mix the illegal timber from Thailand with the cut logs from Burma. Also when the illegal timber is confiscated by Thailand's Royal Forestry Department (RFD), the loggers can simply buy back the wood from the FIO's auction thus legitimising the illegal wood," he said.

The FIO has faced constant opposition from local communities against its commercial plantations, particularly of eucalyptus tree species in northeast Thailand, established as "reforestation". The agency establishes plantations on "degraded" forests --often areas degraded by logging concessions granted by the FIO and the RFD. The agency uses the labour of village people near its plantations areas to secure a continuos supply of timber from its tree plantations. About half of the timber from the plantations is supplied to local companies, 20 per cent is exported and the remaining 30 per cent is used to make products for the government and state agencies.

Since the 1980s, Thailand's local communities have fought bitter battles against the government and the private sector tree farms --especially of eucalyptus-- that appropriate village farmlands and replace common forest areas, lead to water scarcity and soil erosion, and cause loss of local biodiversity. In many of these plantation areas including the FIO's eucalyptus plantations, local communities in northeastern Thailand have succeeded in forcing the government to remove the eucalyptus trees and return the lands to village communities for farming and recovery of community forest.

Despite these problems, however, the Swedish government provided a US$400,000 grant in 1993 for the FIO to hire SCC Natura, a Swedish forestry consulting company, to develop a business development plan that includes a "sustainable plantation management" plan. The "sustainable plantation management" aims to develop a village forestry system on deforested land allocated by the RFD. According to the FIO, the forestry villages are "former shifting cultivators" who will work for the FIO on plantation land. Although the village people cannot own the land, they can plant cash crops as well as have some land for permanent cultivation of rice.

Controversy also remains about the lack of efforts of SmartWood and FIO to seek the wider participation of local people and NGOs in the certification process. The SmartWood team spent a week visiting the FIO's plantation areas in October 2000; there were no formal forums or meetings organised to obtain the views of the many local people affected by the FIO's logging and plantation projects in the past. Smartwood did not consult with representatives of the local community networks, NGOs and academics in different parts of the country involved in the continuing movement to protect Thailand's remaining forest areas from commercial logging and industrial tree plantations.

Clearly, the FIO's dubious past as well as the perspectives of Thailand's environmental movement assumes little relevance in the FSC's plans to impose "certification" and sustain the growth of the global timber industry.

"The forest situation in Thailand is different from Sweden or other countries in the North. The FSC was established to improve commercial logging practices. But in fact, Thailand does not need the FSC because we already have a ban on commercial logging. Therefore, when SmartWood comes and provides 'certification', it undermines the whole of Thailand's environmental movement and the ongoing local processes for increased community control over forests. It renews the commercial influence on Thailand's forests so that these agencies can resume their logging practices," said Witoon.

"In fact, in the recent past, Thailand's environmental movement has called for the dismantling of the FIO since the agency has accumulated massive debts. The FSC and Swedish government's assistance for certification is helping the survival of an agency that has outlived its purpose in the post-logging ban era," he stated. (Bulletin 48, July 2001)

Analysis and information

Comments on the FSC's Principle on Plantations

It is important to begin by highlighting the fact that to receive FSC certification, a plantation company needs to comply with all FSC's principles and not only with the principle concerning plantations specifically-- principle 10.

Having said that, we shall focus on principle 10, which, as it currently stands, appears to allow unsustainable industrial tree plantations --particularly in the South-- to receive certification in spite of their negative social and environmental impacts. What follow are comments on the different criteria included under principle 10.

"Plantations shall be planned and managed in accordance with Principles and Criteria 1 - 9, and Principle 10 and its Criteria. While plantations can provide an array of social and economic benefits, and can contribute to satisfying the world's needs for forest products, they should complement the management of, reduce pressures on, and promote the restoration and conservation of natural forests."

In the South, all of these claims have already been proven unachievable in practice:

- Large-scale industrial monocrops have provided "an array of social and economic benefits" only to the rich.

- What does "can contribute to satisfying the world's needs for forest products" mean in a Southern context? Plantations produce only two forest products: timber and pulpwood. These two --and especially the latter-- are aimed at endless over-consumption by Northern countries and Southern elites. The beneficiary is therefore not "the world" but the rich world. All the other products which are produced by real forests (food, fodder, water, medicine, shelter, fuelwood, etc.), which satisfy the needs of local communities, are almost totally absent from plantations and the local world therefore does not benefit from plantations.

- In most cases, plantations have resulted in the destruction of native forests or other native ecosystems such as grasslands and have not contributed to "complement the management of, reduce pressures on, and promote the restoration and conservation of natural forests". The fact that, despite this, the principle states only that plantations "should" promote conservation, not that they "must", signals its detachment from the real world.

"Principle 10.1. The management objectives of the plantation, including natural forest conservation and restoration objectives, shall be explicitly stated in the management plan, and clearly demonstrated in the implementation of the plan."

- The management objectives of industrial plantations are always explicitly stated: the production of large quantities of timber in the shortest time possible. Large plantation companies often write natural forest conservation and restoration objectives into their plans, but more as a public relations exercise than as a genuine management objective.

"10.2 The design and layout of plantations should promote the protection, restoration and conservation of natural forests, and not increase pressures on natural forests. Wildlife corridors, streamline zones and a mosaic of stands of different ages and rotation periods, shall be used in the layout of the plantation, consistent with the scale of the operation. The scale and layout of plantation blocks shall be consistent with the patterns of forest stands found within the natural landscape."

- There is no positive relationship between industrial plantations and forest conservation. Wood produced in industrial plantations does not, as a rule, substitute for wood extracted from natural stands: the former is mostly aimed at the production of pulp and paper, while the latter is aimed at the timber industry, which requires high-quality wood.

- There are a number of negative relationships, through which large-scale plantations actually promote deforestation. In the first place, most plantations in the tropics substitute for primary or secondary forest, which are clearcut and/or set on fire prior to planting. Secondly, people displaced from their land by plantations have to clear new forest areas in order to survive. Thirdly, it is not unusual for the news that plantations are going to be established in a certain area to result in its deforestation by local speculators in order to be able to sell the land to the plantation companies. Additionally, roads leading to plantations upend up new forest areas to encroachment. Fires originating in plantations, in addition, can extend to nearby forests. In consequence, large-scale plantations are usually both direct and indirect causes of deforestation.

- Most plantation companies are able, if pressed, to make at least a token attempt to set up "wildlife corridors, streamline zones and a mosaic of stands of different ages and rotation periods." However, this does not mean that local ecosystems (forests, grasslands, wetlands and so forth) will not suffer, because there will usually be a number of companies occupying a given area. Wildlife corridors isolated within a sea of eucalyptus or pines are not of much significance for the conservation of wildlife. The same is applicable to the preservation of streamline zones. The impact of these plantations on water must be dealt with at a basin level and not at plantation level. The impact of large masses of fast-growing trees in a given area have already resulted in the disappearance of water courses and profound changes in the water cycle. Finally, almost all companies plant what could be loosely interpreted as “mosaics” of stands of different ages and rotation periods. By itself, however, this implies nothing about the impacts on water, soils, flora and fauna. The size of each “tile” in these so-called “mosaics” is likely to be far larger than in a forest because it is determined by the commercial need to be able to have something to harvest every year, not by ecological criteria.

- What is the meaning of "The scale and layout of plantation blocks shall be consistent with the patterns of forest stands found within the natural landscape"? What happens in cases such as Uruguay, Argentina and South Africa, where plantations are established on grasslands? Such plantations have already been certified in those three countries. Can this be interpreted as meaning that grassland ecosystems are unimportant to the FSC? And in all cases, how can a eucalyptus or pine plantation "be consistent with the patterns of forest stands found within the natural landscape"?

"10.3. Diversity in the composition of plantations is preferred, so as to enhance economic, ecological and social stability. Such diversity may include the size and spatial distribution of management units within the landscape, number and genetic composition of species, age classes and structures."

- This clause is so vague that it could be satisfied merely by planting two species of eucalyptus in a huge industrial plantation rather than just one, and planting two different areas a couple of years apart

rather than planting all the trees at once. In fact, most large industrial plantations already comply with the letter of this principle simply because to do so enhances economic stability (more protection against specific predators). However, such inadequate measures cannot appreciably enhance either ecological or social stability (although the protection against pests provided by some diversity could protect the jobs of plantation workers who might otherwise lose their jobs if the plantation were to be decimated by insects or fungi). And even this call for minimum diversity is not mandatory but merely "preferred".

"10.4. The selection of species for planting shall be based on their overall suitability for the site and their appropriateness to the management objectives. In order to enhance the conservation of biological diversity, 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, shall be carefully monitored to detect unusual mortality, disease or insect outbreaks and adverse ecological impacts."

- This criterion leaves the door wide open to fast-growth exotic tree plantations, which "are based on their overall suitability for the site and their appropriateness to the management objectives" (the production of large volumes of homogeneous raw material for industry). Native species are again only "preferred", not “required”, and if “performance” is measured only by how much industrial wood a species produces, then all industrial plantations will comply with this criterion automatically. There is therefore a need to define “performance” clearly, because most native species' “performance” in the production of water, soil, food, medicine, fodder, etc. is usually far better than that of alien species which produce little --or none-- of these goods. The last sentence ("Exotic species . . . shall be carefully monitored to detect unusual mortality, disease or insect outbreaks and adverse ecological impacts") is very confusing. Are the adverse ecological impacts referred to impacts on the plantation or of the plantation on neighbouring ecosystems and local production?

"10.5. A proportion of the overall forest management area, appropriate to the scale of the plantation and to be determined in regional standards, shall be managed so as to restore the site to a natural forest cover."

- Here again appears the confusion between forest and plantation. (the “overall forest management area” includes industrial plantations, which are not forests.) In addition, what “proportion” of the plantation is to be returned to “natural forest cover”? One per cent? 10 per cent? 50 per cent? Who will determine the regional standards? What if the area never had forest cover (e.g. Uruguay, Argentina, South Africa)? Are plantation owners then exempted from restoring part of their operations to non-plantation vegetation?

"10.6. Measures shall be taken to maintain or improve soil structure, fertility, and biological activity. The techniques and rate of harvesting, road and trail construction and maintenance, and the choice of species shall not result in long term soil degradation or adverse impacts on water quality, quantity or substantial deviation from stream course drainage patterns."

- If this criterion were to be applied consistently, then no large-scale, fast growth, exotic tree plantation could be certified. Yet if applied carelessly, the criterion would allow a great deal of environmentally damaging practice. Who will decide whether this clause has been met or not? Most large plantation companies include (at least on paper) measures and techniques for environmental conservation. However, all their activities will necessarily have impacts --almost always deleterious-- on soil structure, fertility, biological activities and water. From our perspective, there is already enough evidence that, other things being equal, the species, harvesting methods, and maintenance techniques chosen for

industrial monoculture plantations will result, as a rule, "in long term soil degradation or adverse impacts on water quality, quantity or substantial deviation from stream course drainage patterns." Yet of course theoretical studies can be found that claim that this need not be the case, and company studies that claim that fertility and hydrology have not been affected. Who will decide which experiences or set of studies are to be taken seriously? The FSC criterion is mysteriously silent about this key question.

"10.7. Measures shall be taken to prevent and minimize outbreaks of pests, diseases, fire and invasive plant introductions. Integrated pest management shall form an essential part of the management plan, with primary reliance on prevention and biological control methods rather than chemical pesticides and fertilizers. Plantation management should make every effort to move away from chemical pesticides and fertilizers, including their use in nurseries. The use of chemicals is also covered in Criteria 6.6 and 6.7."

- This clause relies so heavily on vague wording such as "minimize", "primary reliance", and "every effort" that it becomes worthless in practice.

- What are referred to as “pests” and “diseases” are frequently those native species which happen to be able to find food within the plantation (a food desert for most native fauna). Eradicating them is in fact a blow to local biodiversity. “Integrated pest management” is hardly great boon in itself if it implies nothing more than the protection of the exotic species against its few local (or exotic) predators. In addition, companies can easily claim that they are "making every effort" to move away from chemical pesticides and fertilizers without actually doing anything to lower their chemical use. In accordance with clause 10.6 (soil fertility), they will argue that there is no available substitute (given the scale of their plantations) to chemical fertilizers. They are already trying, they will say, to replace pesticides with silvicultural methods (thinning, prunning, spacing, etc.) for economic reasons, but, sadly, must still rely on chemical pesticides to a high degree. It is revealing, moreover, that criterion 10.7 says nothing about “moving away” from using herbicides, which are also harmful chemicals.

- In many countries, plantation trees themselves easily become “invasive plant introductions”. What "measures shall be taken to prevent and minimize” such introductions in South Africa, for instance, where it is the introduced eucalyptus, wattles and pines which have turned into “invasive species” in the native ecosystems?

"10.8. Appropriate to the scale and diversity of the operation, monitoring of plantations shall include regular assessment of potential on-site and off-site ecological and social impacts (e.g. natural regeneration, effects on water resources and soil fertility, and impacts on local welfare and well-being), in addition to those elements addressed in principles 8, 6 and 4. No species should be planted on a large scale until local trials and/or experience have shown that they are ecologically well-adapted to the site, are not invasive, and do not have significant negative ecological impacts on other ecosystems. Special attention will be paid to social issues of land acquisition for plantations, especially the protection of local rights of ownership, use or access."

- This is perhaps the best-written criterion. However, its presupposition that “local trials” --which are always small-scale-- can prove the appropriateness of a large-scale industrial planting of a species to an ecosystem in general is mistaken. Small local trials can determine, up to a point, likely rates of growth of an industrial species on a site. They can also determine, to a certain extent, whether the species is likely to be invasive (although if it is in fact invasive, the trial itself will probably result in an invasion). But the only effective test of the social and environmental effects of large-scale plantations are large-scale plantations themselves. The criterion should therefore be revised to specify that no plantations will be

certified in areas where there is enough evidence of substantial negative impacts (social, environmental or both) caused by existing large-scale plantations.

- The last sentence ("Special attention will be paid to social issues of land acquisition for plantations, especially the protection of local rights of ownership, use or access") points in the right direction, but what does "special attention will be paid" actually mean? Does it mean that no certification will take place if any local right has been violated? What if the violation occurred at the hands of speculators or the government before the company bought or rented the land? And again, who decides whether enough "attention" has been paid to land rights issues? The clause is tellingly silent on this question.

"10.9: Plantations established in areas converted from natural forests after November 1994 normally shall not qualify for certification. Certification may be allowed in circumstances where sufficient evidence is submitted to the certification body that the manager/owner is not responsible directly or indirectly of such conversion."

This raises a series of questions --why November 1994? Why "normally" shall not qualify for certification --who decides what is "normal"? Who judges the evidence presented and on what criteria? Would a signed slip of paper saying "I wasn't there when it happened and I didn't do it" suffice? If a second company buys up the plantation from the company responsible for clearing the forest, can the second company then be certified? Presumably the second company wasn't directly or indirectly responsible for the "conversion".

In sum, Principle 10 does not seem to offer nearly enough guarantees to end-consumers that wood from industrial plantations is produced in a socially equitable and environmentally-friendly manner. Neither is the principle very useful for people struggling against plantations at the local or national levels. The main issue (large-scale monocrops) is not taken into account. The problem is not the tree species (eucalyptus, pines, acacias, etc.) but the overall plantation model, which the FSC unjustifiably accepts without discussion. We believe that this principle is clearly insufficient and needs to be substantially modified before it can be said to be appropriate to the reality of large scale industrial tree monocrops. (Special bulletin, February 2001)

Plantations are not forests

One of the main problems for those struggling against large-scale industrial tree plantations is the existing confusion (generated by the UN Food and Agriculture Organization) between forests and plantations (i.e. "natural" forests and" planted" forests.) The FSC's definition contributes to support such confusion by stating that plantations are forests: "Plantation: Forest areas lacking most of the principal characteristics and key elements of native ecosystems as defined by FSC-approved national and regional standards of forest stewardship, which result from the human activities of either planting, sowing or intensive silviculture treatments." That definition enables the FSC to include plantations in its list of "certified forests".

The FSC's definition might be a useful way of defining Northern managed forests, where the original forest has been so simplified that it has become more akin to a plantation than to a forest. But it is not useful at all for people struggling in Brazil, Indonesia, South Africa, Thailand and many other countries against large-scale monocultures of exotic species such as eucalyptus or pines. Such plantations are not forests: they are tree crops.

In spite of the propaganda about "plantations helping to alleviate pressures on forests", experience has proven that not only do plantations not alleviate pressures on forests but, on the contrary, that they are a major direct and indirect cause of deforestation. At the same time, they result in widespread environmental and social problems (see http://www.wrm.org.uy/plantations/index.html)

What foresters call "afforestation" --creating so-called "forests" where they didn't exist before-- usually results in environmental destruction insofar as diverse local ecosystems are replaced by uniform tree monocultures. Despite the FSC's focus on the protection of forests, this type of environmental degradation was not sufficiently taken on board when the organization elaborated its principles and criteria. That perhaps helps explain the contradictions of certification in countries such as South Africa, with its predominant grassland ecosystem.

The FSC was created to protect the world's forests and forest peoples against destructive logging practices, by promoting the sustainable use of forests. Large-scale monoculture tree plantations have little in common with forests and result in serious environmental and social problems. We therefore strongly urge the FSC to exclude such type of plantations from its mandate. (Special bulletin, February 2001)

Plantations already certified by FSC

The following is a selection of plantations already certified by the FSC. We have excluded the smaller plantations (less than 10,000 hectares), as well as those described as "plantation/semi-natural", "plantation/natural" and similar mixes, so as to highlight only those which can be characterized as typical industrial tree plantations. Shell's plantations are not included because they were certified after the last update in the FSC's web page.

(NOTE: This article was written in January 2001. Since then many more large-scale plantations have been certified, but the FSC website does not include now (27 September 2001) information describing the types of "forests" certified. We are thus unable to say which ones are plantations and which ones are forests.)

Hectares of plantations certified in:

BRAZIL
V&M Florestal Ltda.: 235,886
Klabin Fabricadora de Papel e Celulose SA: 218,545
Eucatex SA - Salto & Botucatu and Buri: 48,962
Duratex SA - Botucatu, Lencois Paulistas, & Agudos Districts: 47,904
Plantar SA: 13,414

INDONESIA
Perum Perhutani: Districts of Cepu, Kebonharjo, Mantingan, Kendal Lawu and Madiun: 62,278

NEW ZEALAND
Fletcher Challenge Forests Ltd: 360,000

SOUTH AFRICA
Mondi Forests - Lowveld, Komati, Piet Retief, Natal and Zululand: 431,301
SAPPI Forest Products: 48,507
South African Forestry Company Ltd. - Eastern Cape Region: 42,714
South African Forestry Company Ltd. - KwaZulu-Natal Region: 51,922
South African Forestry Company Ltd. - Mpumalanga North Region: 64,378
South African Forestry Company Ltd. - Mpumalanga South Region: 58,818
South African Forestry Company Ltd. - Western Cape Region: 53,530

UNITED KINGDOM
Northern Ireland Forest Service: 75,500

ZIMBABWE

Border Timbers Ltd.: 47,654
Forestry Commission: 19,085

(Special bulletin, February 2001)