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## [Clear as mud: FSC's position on GM trees](#)

Three years ago, in response to an article I wrote about the pulp industry's involvement in research into genetically modified (GM) trees, I received an email from the FSC Secretariat in Oaxaca, Mexico.

"I assume you are aware," read the email, "that the only forest certification scheme that has a clear position against GM trees is the FSC scheme, and that this issue is particularly relevant to large plantation companies that have the resources to invest in this kind of research and development."

Without FSC, the email continued, activists opposing the development of GM trees would be "left looking for some other practical way of heading off the use of GM trees."

But does FSC really have "a clear position against GM trees"?

Criterion 6.8 of FSC's Principles and Criteria is clear: "Use of genetically modified organisms shall be prohibited." Strictly interpreted this would mean that a company carrying out laboratory research into GM trees (and/or financing such research) should not be certified under the FSC system, because that would involve the use of genetically modified organisms.

But rather than upholding this clear position on GM trees, FSC's policies and standards weaken Criterion 6.8.

In June 1999, FSC's General Assembly approved a motion to complete an FSC Policy on GMOs. "This policy should address among other things the Precautionary Principle. A draft of such clarification and policy should be submitted to the membership for review and comment within 6 months," the motion stated.

In 2000, FSC duly produced an "Interpretation on GMOs", which states that "The use of GMOs is prohibited in certified forests, and would normally constitute a major failure of Principle 6." But the Interpretation does not exclude GM trees planted by the company outside the area to be certified. And why does the word "normally" appear? Under what circumstances could the use of GMOs not constitute a major failure of Principle 6?

FSC's "Interpretation on GMOs" was approved by FSC's Board in May 2000. Yet the interpretation includes the following statement: "This draft has been prepared by secretariat staff. It does not have official status as an FSC position. . . . Please send your comments to the secretariat."

FSC, it seems, does not have a Policy on GMOs, more than eight years after the general assembly passed a motion in favour of one.

In 2000, FSC produced a "Partial Certification Policy" which explains that FSC has no objection to a certified company planting GM trees, as long as they are not in the plantation area to be certified, and as long as there are not too many of them. I'm not joking. Read this extract from the "Partial Certification Policy":

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"For example, a company decides to submit its Unit A for certification assessment. The certifier obtains information indicating that the same company does research regarding genetically modified organisms in another area, Unit B, and that this research covers a limited area of Unit B. In this case, the certifier may determine that, although management of Unit B does not comply with FSC requirements, this lack of compliance does not necessarily demonstrate a lack of commitment on the part of the applicant with the FSC Principles and Criteria, or does not represent a major failure at the level of Principle 1. Nonetheless, if the information obtained were to indicate that the other forestry units of the same company (B, C, etc.) exclusively use genetically modified organisms, the certifier faces a situation which -due to its magnitude and frequency- indicates a clear lack of will on the part of the applicant to comply with FSC Criteria 6.8.

"In this case the certifier must establish whether such lack of commitment represents a major failure at the level of Principle 1, which may have an effect over certification of Unit A."

Meanwhile, FSC's 2004 "Controlled Wood Standard" excludes "wood harvested from genetically modified (GM) trees". According to this, then, it seems that research into and planting of GE trees is allowed provided the wood does not end up in a product carrying the FSC label. But FSC's "controlled wood" relies on company information which is not independently assessed.

I wrote to Andre de Freitas, FSC's Head of Policy and Standards, on 23 August 2007, requesting a clarification of FSC's position on GM trees. De Freitas has not replied to my questions.

So much for FSC's "clear position" on GMOs.

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