



FSC International Center
Kim Carstensen, Executive Director

Dear Mr. Carstensen!

As representatives of Russian non-governmental ecological organizations, we appeal to FSC International to expand the authority of the FSC Russian National Office and to establish a national office of ASI in the Russia to participate in resolution of stakeholder conflicts, provide assistance to stakeholders in the certification process and ensure the consistency and quality of FSC certification.

The current condition of FSC certification in the Russian Federation is cause of great concern to our organizations. We observe strong variation in standard interpretation by certification bodies (CBs), leading to inconsistency in certification quality. In many cases only cursory attention is paid to the ecological principles of the FSC standards, and companies receive certification without any discernible changes from status quo, extensive forest exploitation. In addition, protracted conflicts have developed between stakeholders in some Russian regions regarding the interpretation of Principles 6 and 9 of the FSC standards. Rather than mediate these conflicts some CBs have only exacerbated them through subjective behavior. The internal procedure for CB surveillance has often proven insufficient for detecting and addressing this issue. All this leads to unjustifiably long delays of resolution of the conflicts.

The persistence of this problem is leading to a gradual loss of trust in the FSC system from the side of ecological stakeholders.

The existing FSC procedures were not effective in many cases to solve these problems effectively. The main reasons for this are:

- Lack of CBs determination and ability for objective resolution of conflicts. CBs often concerned only for formal “closure” of the problem, not for elimination of causes.
- Complex procedure for dealing with some complaints. Many local organizations and individuals do not understand how to use this procedure and often need help in the process of complaining.
- The procedure for filing a complaint with ASI is too complex for most stakeholders. Therefore, if the conflict cannot be resolved by CBs they do not have opportunities for further progress.

We feel these problems could be addressed by giving the FSC Russian National Office authority to adjudicate stakeholder disputes and offer authoritative interpretation of the FSC standards. The National Office could play an important role in conducting events for “calibration” of standard interpretation to reduce the inconsistency of certification quality between CBs. It could also offer a great service to small regional stakeholders, who often cannot play the full role allotted to them in the FSC system due to lack the resources and experience with FSC internal procedure. The creation of a national representation of ASI will be more responsive to conflicts around CBs activities as well as to facilitate access to ASI for stakeholders.

For these reasons we ask FSC International to accept the recommendations of the Russian National Working Group Coordinating Committee from November, 21, 2012 and expand the authority of the FSC Russian National Office and establish of ASI national representation.

Sincerely,

Elena Kulikova, WWF Russia

Alexey Yaroshenko, Greenpeace Russia

Mikhail Karpachevsky, Transparent World

Yury Pautov, Silver Taiga Fund

Alexander Markovsky, SPOK

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