

**Mindeststandards für anerkennbare Zertifizierungssysteme**  
**Bereich: Einhaltung der Gesetze**

Präambel :

**Der Forstbetrieb soll alle relevanten Gesetze des Landes sowie internationale Verträge und Abkommen, welche das Land unterzeichnet hat, respektieren und erfüllen und die Prinzipien und Kriterien des Zertifizierungssystems erfüllen, dem er sich verpflichtet hat .**

Problembereich	Kriterien	Indikatoren	Bemerkungen
Gesetze, Verordnungen, Vorschriften	Der Forstbetrieb befolgt die Bundes- und Landesgesetze, Verordnungen sowie kommunale Vorschriften und verbindliche Rechtsvorschriften übergeordneter (überstaatlicher) Organisationen (z.B. EU).	Die relevanten Bundes- und Landesgesetze, Verordnungen sowie kommunale und übergeordneten Vorschriften sind verfügbar. Es gibt keine Anzeichen von Verstößen gegen die Gesetzgebung oder Verpflichtungen, welche den Forstbetrieb bzw. die Waldbewirtschaftung betreffen (insbes. Wald- und Naturschutzgesetze).	
Steuern, Gebühren, Abgaben	Der Forstbetrieb bezahlt alle einschlägigen und gesetzlich vorgeschriebenen oder vertraglich festgelegten Gebühren, Lizenzabgaben und Steuern.	Die Zahlungsverpflichtungen sind dokumentiert (Steuer-Nr., Verträge) Die Erfüllung wird nachgewiesen (Rechnungslegung, Buchführung) Es gibt keine Anzeichen von Verstößen gegen die Entrichtung aller gesetzlich vorgeschriebenen Abgaben.	
Internationale Abkommen und Vereinbarungen	Der Forstbetrieb berücksichtigt die Bestimmungen aller verbindlichen internationalen Abkommen.	Es gibt keine Anzeichen von Verstößen gegen die verbindlichen internationalen Abkommen	CITES, ILO, ITTA, CBD
Illegale Übergriffe von Dritten	Der Forstbetrieb schützt den Wald im Rahmen seiner Möglichkeiten vor illegaler Nutzung und anderen unerlaubten Aktivitäten.	In Fällen unerlaubter Nutzung durch Dritte hat der Forstbetrieb die zuständigen Stellen informiert und dem Verstoß angemessene Maßnahmen ergriffen.	
Richtlinienkonformität	Der Forstbetrieb verpflichtet sich, den Wald gemäß den Richtlinien des Zertifizierungssystems zu bewirtschaften	Der Forstbetrieb schließt einen entsprechenden Vertrag mit einem für das Zertifizierungssystem akkreditierten Zertifizierungsunternehmen ab. Der Forstbetrieb unterwirft sich den obligatorischen Audits.	z.B. FSC, PEFC o.A.

**Mindeststandards für anerkenbare Zertifizierungssysteme**  
**Bereich: Ökologische Auswirkungen**

Präambel (*Richtlinien nachhaltiger Forstwirtschaft, FSC Arbeitsgruppe Deutschland e.V., Okt. 2000*)

Die Waldbewirtschaftung soll die biologische Vielfalt und die damit verbundenen Werte, die Wasserressourcen, die Böden sowie einzigartige und empfindliche Ökosysteme und Landschaften erhalten und dadurch die ökologischen Funktionen und die Unversehrtheit des Waldes gewährleisten

Problembereich	Kriterien	Indikatoren	
Dokumentation und Berücksichtigung des Vorkommens wertvoller, seltener, bedrohter oder besonders empfindlicher Arten, Landschaftsteile, Standorte etc.	Der Forstbetrieb registriert zugängliche Pläne, Gutachten und Meldungen und berücksichtigt sie angemessen in der Betriebsplanung	Es liegen Richtlinien und Anweisungen zum Schutz allgemeiner oder konkreter Bereiche vor.	
Flächenschutz	Es sind repräsentative Waldgesellschaften entsprechend Art und Umfang ihrer Bewirtschaftung geschützt.	Die geschützten Gebiete sind in Karten abgegrenzt und es existieren für sie dem Schutzziel entsprechende Bewirtschaftungs- oder Schutzanweisungen (-pläne)	
Biotop- und Artenschutz	Vorkehrungen sind getroffen für den Schutz von seltenen, gefährdeten und vom Aussterben bedrohten Arten und deren Lebensräume	Es existieren Anweisungen, die bekannte Vorkommen gefährdeter Arten und ihre Habitate bei Bewirtschaftungsmaßnahmen schützen	
Waldstrukturen	Der Forstbetrieb hat als Ziel die Erhaltung oder Erhöhung der Naturnähe und langfristigen Stabilität der Waldstrukturen	Es sind alle für die Waldlebensgemeinschaft erforderlichen Alters- und Stärkeklassen der zugehörigen Baumarten in angemessener Verteilung vorhanden	
Waldregeneration	Waldbausysteme und Erntemethoden garantieren einen angemessenen Anteil natürlicher Sukzession und genetischer Vielfalt innerhalb der Arten sowie die Artenvielfalt selbst.	Es verbleiben bei Erntemaßnahmen ausreichend Samenbäume, bis im Nachwuchs alle Baumarten der natürlichen Waldgesellschaft angemessen und gesichert vorhanden sind.	

DRAFT Technical and economic requirements for forest certification standards (at FMU<sup>1</sup> level)

<b>Issues to be covered (Proforest, 2002, p. 19)</b>	<b>Criteria</b>	<b>Indicators</b>	<b>Reference to agreements, guidelines, etc.</b>
Legal compliance Control of illegal activities	Forest management adheres to the national and/or regional <sup>2</sup> legislative framework.	– The forest management plan, operational plans, etc. are in compliance with the legislative framework (on all levels). All documents are approved by an appropriate governance body.	FSC P1 ITTO C1
		– All required management documents, operational procedures, and guidelines are elaborated and allow the governance body to evaluate forest management against the national / regional (legal) framework.	
	Appropriate measures are implemented by the forest manager and relevant authorities to restrict illegal logging, incendiary attacks, poaching, trade of restricted species, etc.	– The forest manager observes and records illegal activities, and reports to appropriate authorities.	
		– Effects of illegal activities (timber theft, poaching, etc.) with direct or indirect impacts on the resources to be managed are adequately considered in the revision of the (existing) management plan.	
Economic viability	The forest manager clearly states his economic interests and expectations (if existing).	– The forest enterprise demonstrates that it has access to sufficient financial resources that long-term management objectives can be achieved.	FSC P8 ITTO C1

<sup>1</sup> FMU Forest Management Unit

<sup>2</sup> in the context of this paper "region" and "regional" is used for sub-national level (e.g., eco-region, state)

Issues to be covered	Criteria	Indicators	Reference to agreements, guidelines, etc.
Management plan	A medium-term management plan is prepared, implementation is in progress, and it is periodically updated.	– The long- and short-term management objectives, the means for achieving them, and the integration into the regional development plan are clearly stated.	FSC P7 ITTO C4
		– Formulation of production objectives, description and enumeration of all forest resources, description of management system, and assessment of growth dynamics, forest protection measures, and the derivation of AAC <sup>3</sup> are adequately addressed.	
		– The financial plan (part of the management plan) allows to assess the short- to medium-term financial viability (e.g. through IRR <sup>4</sup> ) according to internationally accepted methods.	
	Best-management practice (BMP <sup>5</sup> ) guidelines are available and fully implemented.	– Major forestry activities (those having adverse impacts on social, ecological, or economical environment) are identified.	
		– Forest protection measures are integral part of regular forest management operations.	
		– Technical implementation capacity for scope and intensity of activities is sufficiently proven by operators.	
	The silvicultural system applied is appropriate for the forest type and region.	– Silviculture (natural or artificial regeneration, timber stand improvement, harvesting) is integral part of the overall forest management system.	
		– Timber harvesting is carried out according to BMP.	
		– The definition of short- to medium-term stocking and regeneration targets for forest stands is based on diagnostic sampling.	
		– The desired species composition considers adequately species composition of the potential natural vegetation or it is thoroughly explained why other species are preferred.	
	The principle of sustained yield of all forest products is observed.	– Harvesting levels of any forest produce shall never exceed its increment level.	
		– Silvicultural measures are formulated that target growing stock is reached within appropriate time periods.	
		– Harvesting of any forest produce shall never prohibit natural regeneration of this produce.	

<sup>3</sup> AAC Annual allowable cut

<sup>4</sup> IRR Internal rate of Return

<sup>5</sup> BMP Best management practice

		– Increment data used in the management plan are collected at local level or are based on regional research results.	
		– Regulations respect that removal of forest products by third parties (e.g. log theft) or natural disasters (e.g. fire) has to be accounted for as if it was removed by the forest manager.	
Monitoring and review	Monitoring is conducted to assess the condition of the forest, yield of forest products, activities and their social and environmental impacts.	– Key-variables (forestry, environmental, and social), appropriate for the forest type and its ecological and social environment are identified.	FSC P8 ITTO C4
		– The management plan is periodically revised and the results of monitoring and new information are incorporated.	
		– The frequency and intensity of monitoring of key-variables should be determined by the scale and intensity of forest management operations as well as the relative complexity and fragility of the affected environment. Monitoring procedures are consistent and replicable over time to allow comparison of results and assessment of change.	

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Issues to be covered (Proforest, 2002, p. 19)	Criteria	Indicators	Reference to international agreements or guidelines
Health and safety	<ul style="list-style-type: none"> <li>- Procedures are implemented to ensure the health and safety of forest employees and their families in accordance with or exceeding applicable laws and/or regulations.</li> </ul>	<ul style="list-style-type: none"> <li>- A safety and health policy and a management system are in place which systematically identify hazards and preventive measures and ensures these are taken in the operations.</li> <li>- All necessary equipment, tools, machines and substances are available at the worksite and in safe and serviceable condition.</li> <li>- Safety and health requirements are taken into account in the planning, organization and supervision of operations.</li> <li>- Where workers stay in camps, conditions for accommodation and nutrition comply at least with ILO Code of Practice on Safety and Health in Forestry.</li> </ul>	ILO C. 155, <b>ILO Code of Practice on safety and health in forestry work (1998)</b> ITTO C&I 7.7
MC&I, 30 October 2002	4.2. Forest management should meet or exceed all applicable laws and/or regulations covering health and safety of employees and their families.	<p>4.2.1. Up-to-date information on all applicable laws and/or regulations covering health and safety of forest workers should be disseminated to them.</p> <p>4.2.2. Availability of management policies addressing the health and safety of forest workers and their families in accordance with current legislation and/or regulations.</p> <p>4.2.3. Appropriate safety and operational equipment in good working condition, including operational procedures, should be made available to forest workers in the work place.</p> <p>4.2.4. Forest managers should maintain up-to-date safety records in compliance with all applicable laws and/or regulations covering health and safety of forest workers.</p> <p>4.2.5. Demarcation of hazardous areas and provision of guidelines for storage and handling of hazardous materials.</p>	
Gaps/questions	-	<ul style="list-style-type: none"> <li>- Reference to <b>implementation</b> of H&amp;S policies or incorporation of requirements in planning, organisation and supervision of operations.</li> <li>- Indicator covering conditions for accommodation and nutrition where workers stay in camps.</li> </ul>	
Workers' rights to organise and to at least minimum wage	<ul style="list-style-type: none"> <li>- The rights of employees to organise and to bargain collectively are guaranteed.</li> </ul>	<ul style="list-style-type: none"> <li>- All workers are able to form and join a trade union of their choice without fear of intimidation or reprisal.</li> <li>- Collective bargaining with representative trade unions is carried out in good faith and with best efforts to come to an agreement.</li> </ul>	ILO C. 87 ILO C. 98

	<p>4.3. The rights of workers to organize and voluntarily negotiate with their employers shall be guaranteed as outlined in Conventions 87 and 98 of the International Labour Organization (ILO).</p>	<p>4.3.1. Provisions for workers to freely organize into Union of their own choice in accordance with ILO Convention 87.</p> <p>4.3.2. Provisions for workers the right to organize and undertake collective bargaining leading to agreements in accordance with ILO Convention No. 98- The Right to Organise and Collective Bargaining Convention, 1949 - Articles 1 and 2, ILO Convention No. 111 - Discrimination (Employment and Occupation), 1958 - The Right to Equal Treatment, ILO Convention No. 100 – Equal Remuneration, 1951 - The Right to Equal Pay</p> <p>4.3.3. Availability of appropriate procedures to address grievances raised by workers and/or their organizations and for conflict resolution.</p>	
	- Equality of opportunity and treatment in respect of employment and occupation are guaranteed.	- Terms and conditions of employment, access to employment and vocational training are determined without discrimination on the basis of race, colour, sex, religion, political opinion, national extraction or social origin.	ILO C. 111 ILO C. 100
	- see above	- see above	
		- Does the indicator require the FMU to abide by the mentioned conventions also where this did not result from collective bargaining?	
	- Employees’ remuneration is not below the established minimum wage.	- Wages/income of both employees and of self-employed and contractors are at least as high as those in comparable occupations in the same region and in no case lower than the established minimum wage.	ILO C. 131
	- see above	- See above	
		- Indicator covering remuneration at at least minimum wage for employees of the FMU and contractors	

Issues to be covered (Proforest, 2002, p. 19)	Criteria	Indicators	Reference to international agreements or guidelines
Capacity building among local workers	- Forest management provides equal access to employment and training opportunities for local and forest-dependent people.		ILO C. 169 <sup>6</sup>
MC&I, 30 October 2002	4.1. The communities within, or adjacent to, the forest management area should be given opportunities for employment, training, and other services.	4.1.1. Forest managers provide, where appropriate, support for training, retraining, local infrastructure, facilities and social programs commensurate with the scale and intensity of forest management operations. 4.1.2. Preference be given to responsible people in communities living within, or adjacent to, the PFE for Peninsular Malaysia and forest management areas for Sabah and Sarawak for employment, contracting, training etc.	
Gaps/questions			
Assessment of social impacts	- Social impact assessment is carried out and results incorporated into management planning.	- Stakeholders and their interests are identified - Actual and possible impacts of forest operations on these interests are considered and mitigation measures incorporated into management planning and operations.	ITTO C&I 7, FSC, ILO C. 169 <sup>1</sup>
MC&I, 30 October 2002	4.4. Management planning and operations shall incorporate the results of evaluations of social impact. Consultations shall be maintained with people and groups directly affected by management operations.	4.4.1. Forest managers should evaluate, through consultations, social impact of forest operations directly affecting communities, and the people and groups directly affected by the forest operations should have access to information on the results of the social impact evaluations. 4.4.2. Forest planning and management practices should consider and incorporate the results of such evaluations. 4.3.3. Availability of appropriate procedures to address grievances raised by workers and/or their organizations and for conflict resolution.	
Gaps/questions		- Implication of « should » ?	

<sup>6</sup> ILO Convention 169 is specific to indigenous and tribal people, here it is applied to local communities and forest-dependent people more generally.

Issues to be covered (Proforest, 2002, p. 19)	Criteria	Indicators	Reference to international agreements or guidelines
Benefits for local communities  MC&I in red Gaps/questions in blue	<ul style="list-style-type: none"> <li>- Costs and benefits of forest management are equitably shared among the parties involved (forest owner, forest manager, employees, local forest-dependent people).</li> </ul>	<ul style="list-style-type: none"> <li>- Fair remuneration and employment opportunities for local people (see above under workers' rights and capacity building)</li> <li>- Social responsibilities of the forest operation are agreed with stakeholders through a participatory process.</li> <li>- Fair compensation is provided in the case of loss or damage affecting the legal or customary rights, property resources or livelihoods of local people.</li> </ul>	ILO C: 131, 169 <sup>1</sup> ITTO C&I 7 FSC 2, 4 Rio Forest Principles, 2b
	<p>4.5. Appropriate mechanisms shall be employed for resolving grievances and for providing fair compensation in the case of loss or damage affecting the legal or customary rights, property, resources, or livelihoods of local peoples. Measures shall be taken to avoid such loss or damage.</p>	<p>4.1.1. Forest managers provide, where appropriate, support for training, retraining, local infrastructure, facilities and social programs commensurate with the scale and intensity of forest management operations.</p> <p>4.5.1. Provisions and measures within relevant national and regional legal frameworks should be taken to prevent loss or damage affecting the local people's legal or customary rights, property, resources, or their livelihoods.</p>	
		<ul style="list-style-type: none"> <li>- Element of agreements of FMU's social responsibilities with stakeholders (i.e. to complement indicator 4.1.1.).</li> <li>- Element of compensation</li> </ul>	
	<ul style="list-style-type: none"> <li>- Legal or customary resource use and tenure rights of local communities are recognised and upheld.</li> </ul>	<ul style="list-style-type: none"> <li>- Before measures are undertaken which may affect these rights local communities are consulted through appropriate procedures and in particular through their representative institutions..</li> </ul>	ILO C: 169 <sup>1</sup> ITTO C&I 7.16
	<p>2.2. Local communities with legal or customary tenure or use rights shall maintain control, to the extent necessary to protect their rights or resources, over forest operations unless they delegate control with free and informed consent to other agencies.</p>	<p>2.2.1. Availability of documentation, if any, of legal or customary tenure or use rights of local communities within relevant national and regional legal frameworks in the PFE for Peninsular Malaysia and forest management areas for Sabah and Sarawak.</p> <p>2.2.2. Forest managers should collaborate with holders of duly recognized legal or customary tenure or use rights within relevant national and regional legal frameworks, in activities that may affect such rights.</p>	

Issues to be covered (Proforest, 2002, p. 19)	Criteria	Indicators	Reference to international agreements or guidelines
Benefits for local communities (contin.)  MC&I in red Gaps/questions in blue		<ul style="list-style-type: none"> <li>- Question regarding implication of “if any”, and whether the indicator implies that only documented tenure and use rights are covered?</li> <li>- Question regarding the protection of rights that are not “duly recognised”?</li> <li>- Element of consultation (with procedures acceptable to rights holders) before operations may affect such rights (i.e. before grievances/disputes arise which are covered by 4.5.2. or 2.3.2.)</li> </ul>	
	<ul style="list-style-type: none"> <li>- Sites of cultural, ecological, economic or spiritual significance to local communities are identified, mapped and protected</li> </ul>	<ul style="list-style-type: none"> <li>- Identification of sites in consultation with local communities.</li> </ul>	ILO C: 169 <sup>1</sup> ITTO C&I 7.14
	3.3. Sites of special cultural, ecological, economic or religious significance to indigenous peoples shall be clearly identified in cooperation with such peoples, and recognized and protected by forest managers.	3.3.1. Availability of list and maps depicting locations of important cultural, ecological, economic or religious sites in the area to be certified. 3.3.2. Availability of appropriate mechanisms within current administrative processes for identifying and protecting such sites, including processes for conflict resolution, and to encourage the participation of indigenous people. 3.3.3. Records of dialogue between forest managers and appointed representatives of local communities. 3.3.4. Rights of access to these sites by indigenous people, recognized within relevant national and regional legal frameworks, or by mutual agreement should be permitted.	
		<ul style="list-style-type: none"> <li>- Question regarding coverage of non-indigenous local communities?</li> </ul>	

Issues to be covered (Proforest, 2002, p. 19)	Criteria	Indicators	Reference to international agreements or guidelines
Rights of indigenous people	<ul style="list-style-type: none"> <li>- Legal or customary resource use and tenure rights of indigenous people are recognised and upheld.</li> </ul>	<ul style="list-style-type: none"> <li>- The rights of ownership and possession of indigenous peoples over the lands which they traditionally occupy is recognised.</li> <li>- The right of indigenous peoples to use lands to which they have traditionally had access for their subsistence and traditional activities is safeguarded.</li> <li>- Indigenous peoples can decide their own priorities for the process of development as it affects their lives, beliefs, institutions and spiritual well-being and the lands they occupy or otherwise use.</li> <li>- Before measures are undertaken which may affect these rights indigenous peoples are consulted through appropriate procedures and in particular through their representative institutions.</li> </ul>	ILO C: 169 <sup>1</sup> ITTO C&I 7.16
MC&I, 30 October 2002	<p>3.1. Indigenous peoples shall control forest management on their lands and territories unless they delegate control with free and informed consent to other agencies.</p> <p>3.2. Forest management shall not threaten or diminish, either directly or indirectly, the resources or tenure rights of indigenous peoples.</p>	<p>3.1.1. Availability of documentation of the customary rights of indigenous people's lands within relevant national and regional legal frameworks.</p> <p>3.1.2. Management of such lands is controlled by indigenous people unless they delegate control with free and informed consent to other agencies.</p> <p>3.1.3. Availability of appropriate mechanisms to resolve any conflicts and grievances between parties involved.</p> <p>3.2.1. Forest management practices in indigenous people's lands recognized within relevant national and regional legal frameworks should not threaten or diminish, either directly or indirectly, their resources or tenure rights.</p>	
Gaps/questions	-	<ul style="list-style-type: none"> <li>- Questions regarding implication of requirement for documentation (see under Benefits for local communities) and protection of rights on lands which indigenous peoples have traditionally occupied or had access to, but which are not legally recognised.</li> <li>- Element of consultation (with procedures acceptable to rights holders) before operations may affect such rights (i.e. before grievances/disputes arise)</li> </ul>	

Issues to be covered (Proforest, 2002, p. 19)	Criteria	Indicators	Reference to international agreements or guidelines
Complaints and dispute resolution	- Appropriate mechanisms are employed for the redress of grievances and the resolution of disputes.	- Every reasonable effort is made to resolve conflicts through fair consultation aiming at achieving agreement or consent. - The mechanisms employed are widely accepted.	ILO C: 169 <sup>1</sup> Rio Declaration, Principle 10
MC&I, 30 October 2002	<p>4.5. Appropriate mechanisms shall be employed for resolving grievances and for providing fair compensation in the case of loss or damage affecting the legal or customary rights, property, resources, or livelihoods of local peoples. Measures shall be taken to avoid such loss or damage.</p> <p>2.3. Appropriate mechanisms shall be employed to resolve disputes over tenure claims and use rights. The circumstances and status of any outstanding disputes will be explicitly considered in the certification evaluation. Disputes of substantial magnitude involving a significant number of interests will normally disqualify an operation from being certified.</p>	<p>4.5.2. Appropriate mechanisms within relevant national and regional legal frameworks are employed to resolve grievances involving loss or damage affecting the local people's legal or customary rights, property, resources, or their livelihoods, caused by forest operations.</p> <p>2.3.1. Records of all disputes over tenure and use rights are maintained for areas in the PFE for Peninsular Malaysia and forest management areas for Sabah and Sarawak.</p> <p>2.3.2. Availability of appropriate mechanisms to resolve such disputes.</p> <p>3.1.3. Availability of appropriate mechanisms to resolve any conflicts and grievances between parties involved.</p>	
Gaps/questions	-	- Element of acceptance of mechanisms by parties involved.	

Issues to be covered (Proforest, 2002, p. 19)	Criteria	Indicators	Reference to international agreements or guidelines
Participation and Consultation	<ul style="list-style-type: none"> <li>- Consultations with people and groups affected by forest management are maintained and their participation is encouraged</li> </ul>	<ul style="list-style-type: none"> <li>- All interested parties have access to and are provided with timely, reliable and accurate relevant information such as expected impacts of forest operations, benefit-sharing arrangements and decision-making procedures.</li> <li>- All interested parties have the opportunity to participate in decision making processes.</li> <li>- All interested individuals are able to form and join organizations of their choice without fear of intimidation or reprisal.</li> <li>- Organizations of interested parties are accepted as participants in decision making.</li> </ul>	ILO C: 141, 169 <sup>1</sup> ILO C. 87, 98 ITTO C&I 1.8, 1.9, 7.17 Rio Declaration, Principle 10 Rio Forest Principles, 2c
MC&I, 30 October 2002	<p>7.4. While respecting the confidentiality of information, forest managers shall make publicly available a summary of the primary elements of the management plan, including those listed in Criterion 7.1.</p> <p>4.4. Management planning and operations shall incorporate the results of evaluations of social impact. Consultations shall be maintained with people and groups directly affected by management operations.</p>	<p>7.4.1. A summary of the primary elements of the forest management plan as prepared and implemented under Indicator 7.1.1 should be made available to the public.</p> <p>4.4.1. Forest managers should evaluate, through consultations, social impact of forest operations directly affecting communities, and the people and groups directly affected by the forest operations should have access to information on the results of the social impact evaluations.</p> <ul style="list-style-type: none"> <li>-</li> </ul>	
Gaps/questions	<ul style="list-style-type: none"> <li>-</li> </ul>	<ul style="list-style-type: none"> <li>- Element of participation in decision-making processes.</li> <li>- Information about benefit-sharing arrangements and decision-making procedures.</li> </ul>	

Issues to be covered (Proforest, 2002, p. 19)	Criteria	Indicators	Reference to international agreements or guidelines
<b>Training and Supervision</b> <i>(In the Proforest table of issues to be considered, the issue of training and supervision is dealt with in the section "Technical and economic")</i>	- Professional and technical personnel at all levels is adequately trained to perform and support forest management planning and implementation.	- Managers and supervisors are in possession of an appropriate qualification, preferably one that is nationally recognized, ensuring that they are able to plan and organize forest operations. - All workers, as well as contractors and their workers and self-employed persons, are sufficiently educated and trained in the tasks they are assigned to and hold the relevant skill certificates.	ILO C: 142, <b>ILO Code of Practice on safety and health in forestry work (1998)</b> ITTO C&I 1.5
<b>MC&amp;I, 30 October 2002</b>	<b>7.3. Forest workers shall receive adequate training and supervision to ensure proper implementation of the management plan.</b>	<b>4.1.3. Preference should be given to the employment of qualified forest workers with appropriate training certificates.</b> <b>7.3.1. Availability of facilities and programs for training of forest workers for proper implementation of the forest management plan.</b> <b>7.3.2. Forest workers should be trained as to their respective roles in the implementation of the forest management plan.</b>	
<b>Gaps/questions</b>	-	- Element of possession of an appropriate – preferably certified or nationally recognised - qualification at all levels.	

*The issue of child and forced labour did not fit any of the Proforest categories of issues and should be dealt with elsewhere, e.g. compliance with all national and international legislation and agreements.*

**Main gaps identified provisionally<sup>7</sup> between general requirements for certification standards in the social field and the MC&I:**

- Implementation of health and safety policies
- Consultation with persons/communities affected by management operations using procedures accepted by those groups, including agreements regarding the social responsibilities of forest enterprises
- Recognition of tenure and resource rights of local and indigenous communities where these may not be legally established and documented
- Conflict resolution procedures accepted by parties involved
- Compensation for loss or damage to those affected by forest management operations in their tenure or resource use rights
- Appropriate qualification of personnel

<sup>7</sup> The coverage of these gaps might be clarified by further explanations regarding the interpretation of the MC&I.

**Explanation of the FSC procedures based on the requirements for standards, certification and accreditation in the checklists in 'Assessing Forest Certification Schemes, a practical guide' by Proforest.**

**14 March 2003**

Compilation by Eleonore Schmidt (GFA Terra Systems) as input to the 'Rundertisch Hamburg' to determine a framework for the evaluation of certification schemes.

Standards checklist

Component		Key factor	Relevant or not?	Specific design requirements
General	ISO and WTO (4)	In assessing a standard it is important to establish that both the process and the content meet ISO guidelines. It may also be useful to be aware of WTO requirements.		FSC meets ISO guidelines in general. Important points that are covered: 1. Scope of the standard is clear 2. Written procedures based on consensus principles 3. Procedures of standardising body available to interested parties 4. Impartial complaints and appeals procedures 5. Approval based on evidence of consensus 6. Standards not to be abused to mislead users 7. Participation at all levels during standard setting for interested parties 8. Existence of a hierarchical framework between international, regional and national standards (WTO requirement)
Standards Development process (4.1)	Who is involved in developing the standard? (4.1.1)	There should be defined requirements for the composition of the standard-setting group which will ensure appropriate input of both best available knowledge and decision-making.		Representation of major stakeholder groups obligatory. Decision making and input procedures to be defined in a way that no interest can dominate over the other. Consultation procedures need to be in place and ensure equal access as well as taking into account of comments received.
	How does the standard-setting group work?	There should be defined requirements for the process used by the standard-setting team to reach decisions which will ensure that the way gaps in information are addressed and conflicting requirements are balanced is appropriate.		Not specifically addressed within the FSC system. Conflicting requirements are solved through the decision making process which is balanced.

Content of standards (4.2)	Types of standard: system and performance (4.2.1)	The choice of a system or performance standard will depend on what the certification scheme is expected to deliver: a framework for management or a guaranteed minimum level of performance or a combination of both.	FSC is performance oriented, although some system requirements exist as well (consultation procedures, complaints systems, management plan)
	Performance requirements (4.2.2)	<p>The precise requirements of a performance standard are extremely important in determining what a forest certification system delivers. The broad range of issues which should be covered can be found in a number of international processes, but there is no single internationally-agreed set of criteria with broad support against which standards can be assessed. There are three ways of overcoming this difficulty in order to assess standards:</p> <ul style="list-style-type: none"> <li>• Develop a detailed set of requirements to which the standards used by candidate schemes can be compared.</li> <li>• Base the assessment on the process used to formulate the standard rather than the standard itself in which case the degree of participation in this process becomes critical</li> <li>• Use a combination of defined requirements and assessment of the standard-setting process.</li> </ul>	It is up to HH to make this choice. The author would prefer the third route.
	How is the standard written? (4.2.4)	It is important to ensure that standards are clearly and precisely written, and that where there is a need to allow flexibility, adequate guidance is provided to certification bodies.	<p>Desired characteristics of standards taken into account during evaluation are:</p> <ul style="list-style-type: none"> <li>• Easily understandable by a wide audience, using clear language;</li> <li>• Cost effective</li> <li>• Easy to detect and record</li> <li>• Reliable and consistent</li> <li>• Efficiency of indicators</li> <li>• Useful and appealing to certifiers/forest managers</li> </ul> <p>National initiatives are expected to provide guidance notes and to be available for consultation. In practice, this does not always function well.</p> <p>General guidance is provided through the certification bodies forum and through the 'Guidelines for certification bodies'. Indicators and verifiers are to be adapted depending upon the local situation.</p>

	Applicability (4.2.5)	It is important to be clear before assessing a scheme what type and area of forest it applies to, and that an appropriate mechanism is in place to control this.		FSC applies to all forest types anywhere in the world. Nonetheless, the certifier is required to determine and explicitly state the scope (area and forest type) before an evaluation.
Small Forest Enterprises (4.3)		Is there a mechanism to ensure that the standard does not act as a barrier to certification for SFEs?		FSC Group certification scheme.

Certification checklist

Component		Key factor	Relevant or not?	Specific design requirements
Establishing that the standard has been met: People and organisations responsible (5.1.1)	Type of organisation running the process (5.1.1.1)	There are three main issues to consider when looking at who is responsible for the certification process. Firstly, does the scheme require certification to be undertaken by an independent, third party certification body or is first or second party assessment accepted. Secondly, is there a requirement for the certification body to meet ISO guidelines. Finally, is there a requirement for accreditation		Third party certification. Extensive obligatory accreditation process. Accreditation procedures are based on ISO guidelines, but certifier itself does not need to prove that it meets all ISO requirements. Not all ISO requirements are stated in the accreditation requirements, such as the existence of a documented quality system and manual.
	Assessment team (5.1.1.2)	There are three important questions to ask about an assessment team. Firstly, is the team leader adequately trained as an assessor? Secondly, do the team have the combined expertise to assess all aspects of the standard? Thirdly, do the team have the capacity to adequately interpret the standard for the forest being assessed?		<p>This is a weak point in the FSC system. The accreditation manual only requires that: ‘The certification body must specify criteria for the selection of personnel for assignment to particular positions. The criteria must include:</p> <p>11.2.1.1 specification of appropriate education, training and experience;</p> <p>11.2.1.2 the requirement that some member(s) of each evaluation team of the certification body must have:</p> <p>a. previous experience in the country where an evaluation takes place;</p> <p>b. knowledge of the language of the country where the evaluation takes place.</p> <p>11.2.2 For evaluation of forest management enterprises, the criteria must include the requirements that some member(s) of the evaluation team of the certification body must have knowledge of:</p> <p>11.2.2.1 the forest management system (including silviculture) being implemented in the evaluated forest;</p> <p>11.2.2.2 the local forestry context.</p>

Establishing that the standard has been met: Assessment methodology (5.1.2)	Use of objective evidence (5.1.2.2)	For all assessments it is important to establish not only that plans are assessed, but also that there is collection of objective evidence that the plans are implemented in practice. In addition, for performance standards, it is essential that objective evidence is collected to establish whether the outcome is adequate to meet the performance requirements of the standard.		The main evaluation is based on field visits and review of relevant documents plus interviews. During these assessments evidence is collected and compared with the requirements. Certifiers have to prove in their reports how they arrived at their conclusions by detailing the findings.
	Sampling	<p><b>When assessing a certification scheme it is very important to assess:</b></p> <ul style="list-style-type: none"> <li>• The size or proportion of the sample which is used, relative to the total population, and the justification for that size</li> <li>• The way in which samples are chosen to ensure statistical validity and avoid introducing unnecessary bias.</li> </ul>		Each certifier is required to have an adequate sampling system that takes into account the variability of management practice, operations, forest communities, ecosystems and environments in the unit area, the experience and confidence of the evaluation team and the reputation of the enterprise.
Establishing that the standard has been met: Making the decision (5.1.3)	Interpretation of the standard (5.1.3.1)	<p>It is important to establish that the issue of local interpretation of the standard is adequately addressed. The degree of interpretation will depend on:</p> <ul style="list-style-type: none"> <li>• The precision of the standard relative to the forest types included in the scheme</li> <li>• The complexity and size of the forest being assessed</li> <li>• The previous experience of using the standard and the degree of precedence which exists.</li> </ul>		<p>Local interpretations (indicators and verifiers) are developed by multi-stakeholder National Initiatives.</p> <p>FSC provides for the local adaptation of its P&amp;C by the certifier in regions where no endorsed national standards exist. The adaptation has to be circulated for comments at least 1 month before the evaluation. While adapting the standard, the certifier has to take into account any draft standards existent for the region and/or forest types.</p>
	Non-compliances (5.1.3.2)	When assessing a certification scheme, it is very important to check how non-compliances are categorised and to ensure that it is appropriate. It is also important to see how progress by a certified organisation in addressing minor non-compliances is monitored by the certification body.		<p>Failures at the principle level result in a major CAR's or pre-conditions. Failures at individual indicator or criteria level in minor CAR's or conditions.</p> <p>Progress towards fulfilment of minor CAR's is to be addressed during the surveillance visits.</p>

	Decision-making process (5.1.3.3)	When assessing a certification scheme it is important to ensure that it has a certification decision-making process which meets ISO guidelines and ensures that the final decision is based on an adequate understanding and analysis of the objective evidence.		The final decision is taken by a certification review committee or person, independent of the evaluation itself. This committee reviews the certification report, the peer review reports, plus comments received from the client or stakeholders to arrive at their decision. This is in line with ISO requirements.
	Surveillance (5.1.3.4)	Certification schemes must include the requirement for regular and adequate monitoring of certificate holders and mechanisms to remove certificates if the standard is no longer being met or if Corrective Action Requests (CARs) have not been met.		Monitoring visits at the FMU level should take place at least once a year. Minor CAR's are automatically upgraded to major CAR's when these are not fulfilled at the stipulated time. This results in suspension of the certificate. If the forest management fails to correct the incompliances in time, then the certificate will be revoked.
Ensuring confidence in the process and decision (5.2)	Accreditation (5.21.)	Credible accreditation is fundamental to credible third-party certification.		See below under accreditation.
	Complaints procedures (5.2.2)	Certification bodies should have documented procedures which, when implemented, are able to resolve any complaints, appeals and disputes		Certifiers are required to have documented complaints procedures covering complaints from clients, as well as stakeholders.

<p>Transparency (5.2.3)</p>	<p>Information on the certification body (5.2.3.2)</p>	<p>There should be a requirement that the information on certification bodies suggested by ISO is made available to interested parties.</p>	<p>Certifiers are required to make the following information available:</p> <ul style="list-style-type: none"> <li>• A summary of the certification reports This includes the contact details for the certifier.</li> <li>• application form (or equivalent documents);</li> <li>• fee structure and policy;</li> <li>• evaluation and certification contracts;</li> <li>• application and evaluation procedures;</li> <li>• certification system, including its rules and procedures for granting, maintaining, extending, suspending and withdrawing certification;</li> <li>• procedures for handling complaints, appeals and disputes;</li> <li>• authority under which the certification body operates</li> </ul> <p><b>Furthermore, FSC is supposed to make a public summary of the accreditation report available to FSC members.</b></p> <p>All ISO requirements are addressed. The public summary of the certification reports is not an ISO requirement.</p>
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	Consultation and participation (5.2.3.2)	The degree of consultation required as part of the certification process should be clearly defined, based on the need to interpret the standard, collect objective evidence and boost credibility. Issues of diversity and representativeness of those consulted, the effectiveness of the consultation methodology used, and the particular case of small forest enterprises should be considered.		Consultation on the standard used (in situations where no endorsed standard is existent) and stakeholder opinions at least 1 month before the main evaluation. FSC Requirement: <i>'The certification body must have a documented system for the identification of and consultation with local or national government and non-government organisations which are involved in forest management, and which represent a range of environmental, ecological, legal, social, and economic perspectives, before the evaluation takes place.'</i> As a rule, at least all FSC members and National Initiatives should be contacted. Comments received through consultation form an integral part of the certification report (while respecting confidentiality and privacy) and need to be addressed by the certifier.
	Publicly available information (5.2.3.3)	Provision of information on the results of the assessment can contribute significantly to transparency, but reduces confidentiality for the forest manager and increases cost.		The certifier needs to make a public summary of the certification evaluation available upon request.
Certification of small forest enterprises (5.3)		Is there an effective and credible mechanism for ensuring that the certification process is available to SFEs at a reasonable cost through mechanisms such as group certification schemes?		FSC operates a group certification scheme for forest management as well as chain of custody.

Accreditation checklist

Component		Key factor	Relevant or not?	Specific design requirements
Requirements for accreditation bodies (6.1)	Accreditation body organisation (6.1.1)	An accreditation body should conform to the organisational requirements set out in ISO/IEC Guide 61.		FSC does not fulfil this requirement if a strict division between the standard setting body and the accreditation body is required, since FSC is also responsible for standard setting. Other requirements, such as non-discrimination and accessibility and impartiality are fulfilled.
	Accreditation procedures (6.1.2)	Accreditation bodies must have in place a structure for the accreditation process that is adequate to ensure that it makes reliable and competent decisions..		All requirements and procedures are stated in the Accreditation Manual. The system provides for review of documented procedures as well as field visits to offices and certified operations to assess the capabilities of the applicant.
	Competence of accreditation body personnel (6.1.3)	Accreditation bodies for forest certification must specify minimum competencies for assessment staff, ensure the competencies include relevant forestry and forest certification qualifications, knowledge and experience, and must have adequate recruitment, training and continuous professional development procedures.		These were absent until 2001. In the mean time job descriptions have been developed. The author does not know whether recruitment, training and professional development procedures are existent.
	Accreditation assessment methodology (6.1.4)	An accreditation body's evaluation procedures must ensure that accreditation decisions are supported by sufficient objective evidence.		Based on the reports of the different stages of the accreditation process, the Secretariat prepares a final report with recommendations for the Board that takes the accreditation decision. This final report includes excerpts of all the results of the foregoing stages in the accreditation process.
	Geographical scope of accreditation	The geographical scope of the accreditation should meet the needs of the user for national, regional or international coverage. The accreditation methodology should be specifically designed for the geographical scope provided.		Applicants can apply for accreditation of forest management or chain of custody or combined. If wished, a geographical scope can be defined as well, otherwise it is assumed that the accreditation is world wide.
Requirements for certification bodies (6.2)		Accreditation bodies must specify the requirements that certification bodies must meet. These should include the generic requirements set out in ISO/IEC Guides 62 and 65 and requirements specific to certification of forest management.		All requirements are detailed in the Accreditation Manual which is based on ISO/IEC Guides 62 and 65. Apart from the requirement of the documented quality system and manual, all requirements are addressed.
Confidence in accreditation (6.3)	Affiliation to international bodies (6.3.1)	An useful indicator of an accreditation body's credibility is affiliation to an international organisation that is open to it.		FSC is a full member of ISEAL (International Social and Environmental Accreditation and Labelling Alliance).

	Complaints procedure (6.3.2)	Accreditation bodies should have documented procedures for resolving complaints, appeals and disputes.	Are available. Based on the principle that complaints should be resolved at the lowest possible level. This implies that all bodies within the system need to have appropriate systems in place. FSC itself only processes complaints through the dispute resolution committee that are directly related to their own activities (accreditation decisions, behaviour of staff and Board etc.) or complaints that were not resolved at the lower levels (e.g. certifiers, national initiatives). However, these procedures are designed in a way that gives FSC much more rights than the complainant. Such as; if FSC does not react within the specified timeframe, then the claim is assumed to be rejected. This means that FSC does not have the obligation to elucidate or justify their decisions.
	Transparency (6.3.3)	Transparency in accreditation can make certification schemes more credible. In deciding the appropriate level of transparency, a balance has to be struck between the requirements of external stakeholders on the one hand and additional cost and loss of confidentiality on the other.	The Secretariat has to make a public summary of the recommendation of accreditation to the Board available to its members before a decision is taken. The accreditation contract can only be signed after the 2 months appeals period has expired.
Content of claims (7.2)		Claims that are made about the quality of management in a forest or that wood in a product comes from certified forests should comply with the general principles of ISO 14020 and relevant specific guidance contained in ISO 14021 and ISO 14024.	Will be addressed in more detail by Stefan Schardt. <ul style="list-style-type: none"> <li>• Environmental Labels shall be accurate, relevant and not misleading</li> </ul> <b>Specified formats are designed by FSC to avoid false claims. Certifier responsible for correct logo use of clients.</b> <ul style="list-style-type: none"> <li>• Procedures and requirements should not create unnecessary barriers to international trade</li> </ul> Logo can be freely used when c-o-c certification is obtained. Requirements only concern the type of claims to be made. <ul style="list-style-type: none"> <li>• Claims should be based on scientific results and should be accurate and reproducible</li> </ul> Claims based on adherence to c-o-c standard, therefore reproducible. Claim of 'sustainably

			<p>managed' or 'well-managed' is not proven scientifically.</p> <ul style="list-style-type: none"> <li>Information should be available to interested parties</li> </ul> <p><b>Information available from certifier, FSC and organisation handling certified products.</b></p> <ul style="list-style-type: none"> <li>All relevant aspects of the lifecycle should be taken in to account</li> </ul> <p><b>Not fulfilled; system only addresses forest management.</b></p> <ul style="list-style-type: none"> <li>Not inhibit innovations</li> </ul> <p>Claims do not concern production methods, and therefore do not inhibit innovations.</p> <ul style="list-style-type: none"> <li>Administrative requirements relevant to check conformity with claim</li> </ul> <p>Requirements concern the origin of the wood, and the correct use of the logo and are thus relevant.</p> <ul style="list-style-type: none"> <li>Development process includes an open, participatory consultation with interested parties</li> </ul> <p><b>All policies within FSC are developed following consultation principles.</b></p> <ul style="list-style-type: none"> <li>Information of claims available to purchasers of the products</li> </ul> <p>All claims need to be accompanied by additional information about the logo, and what it stands for.</p>
Verifying claims (7.3)	Certification of chain of custody (7.3.2)	Claims about the origins of the wood contained in a product must be supported by effective chain of custody certification. The elements of chain of custody certification are the standard, certification and accreditation. The content of the standard should cover product identification, product segregation and documentation.	<p>Will be addressed in more detail by Stefan Schardt.</p> <p>The FSC system does cover all the different aspects for chain of custody.</p>

## Holzflussverifizierung: Beschreibung MTCC -System Vergleich MTCC – FSC

### Begriffsklärung

In der öffentlichen Diskussion wird gemeinhin von zwei Komponenten der Holzzertifizierung gesprochen,

- o der Zertifizierung von Forstbetrieben und
- o der Chain of Custody Certification.

Dies sind zweifellos zentrale Bestandteile eines jeden Zertifizierungssystems, der Gesamtkomplex, der hier zu betrachten ist, ist jedoch erheblich weiter gefasst. Die Bestandteile des Gesamtprozesses der Zertifizierung von Forstwirtschaft und Kennzeichnung von Holz und Holzprodukten besteht aus fünf Elementen:

1. Standardsetzung
2. Akkreditierung der Zertifizierer
3. Zertifizierung von Forstwirtschaft
4. Verifizierung des Flusses von Holz aus zertifizierten Forstbetrieben
5. Kennzeichnung von Holz und Holzprodukten mit der Herkunft aus zertifizierten Forstbetrieben.

Eine Übersicht zu diesen Prozessen ist in Schaubild 1 grafisch dargestellt.

Der Prozess der Holzflussverifizierung und der Kennzeichnung wird beim FSC - wie bei allen anderen Systemen, die sich eng an FSC anlehnen - sprachlich und begrifflich unscharf als Chain of Custody Certification bezeichnet. Entsprechend unscharf ist auch die Definition der Chain of Custody beim FSC:

**Chain of Custody:** *The channel through which products are distributed from their origin in the forest to their end-use. (FSC)*

Eine erheblich präzisere Definition findet sich bei Marco Simula:

**Chain of Custody (CoC)** *refers to all the changes of custodianship of forest products and products made there of during the transportation, processing and distribution chain from the forest to the final end use. When the CoC is verified, the origin of forest products is established. (Simula, report EU, DG VIII/a/1 15/09/97)*

Auch wenn sich der Begriff der Chain of Custody Zertifizierung inzwischen eingebürgert hat, so ist dieser Begriff leider eher verwirrend, denn aufklärend:

o Zertifizierung ist ein Prozess, in welchem anhand einer bewertenden Prüfung festgestellt wird, ob bestimmte Standards erfüllt werden. Dies ist der Fall bei der Forstzertifizierung.

o Im Gegensatz zu dieser wertenden Prüfung Forst wird im Folgenden nur verifiziert, ob das Holz in einem bestimmten Produkt aus einem zertifizierten Forstbetrieb stammt oder nicht. Eine darüber hinaus gehende Bewertung der Prüfung von ökologischen Standards findet in der Regel nicht statt.

Eine Kennzeichnung von Holzprodukten setzt deren Herkunft aus zertifizierten Forstbetrieben mit einer Holzflussverifizierung voraus, ob allerdings gekennzeichnet wird, ist eine freie Entscheidung des Produzenten und/oder des Händlers. Derzeit wird nur ein Bruchteil des in zertifizierten Wäldern produzierten Holzes entsprechend gekennzeichnet. Die Art und Weise der Nutzung der Kennzeichnung wiederum liegt in der freien Verfügung des Zeichengebers.

## **System der Holzflussverifizierung und Kennzeichnung beim MTCC**

### **Holzflussverifizierung**

Die Regeln der Holzflussverifizierung sind beim MTCC in den „Requirements and Assessment Procedures for chain-of-custody certification“ vom 3. November 2000 geregelt.

MTCC unterscheidet wie alle anderen Zertifizierungssysteme

o Physischer Separierung und

o Prozentauszeichnung (bei Spanfaserprodukten)

beim Nachweis für die Herkunft aus zertifizierten Forstbetrieben.

Die Holzflussverifizierung wird über unabhängige, jedoch vom MTCC akkreditierte, Zertifizierer durchgeführt. Für die ersten zwei Jahre ist eine halbjährliche, ab dem dritten Jahr eine jährliche Inspektion vorgesehen.

### **Kennzeichnung**

Holz und Holzprodukte, deren Herkunft aus MTCC zertifizierten Forsten durch eine Holzflussverifizierung bestätigt wurden, können mit dem MTCC -Logo gekennzeichnet werden. Das on-product statement lautet: „***The wood in this product comes from forests independently certified according to the rules of the Malaysian Timber Certification Council.***“

Mit dem MTCC -Logo können ausgezeichnet werden:

o Massivholzprodukte, wenn sie zu 100% aus MTCC -Holz bestehen und

o Kollektionen von Massivholzprodukten, wenn sie zumindest aus 70% MTCC -Holz bestehen

o Zusammengesetzte Produkte (z. B. Möbel), wenn die Massivholzteile zumindest zu 70% aus MTCC -Holz bestehen und die Spanfaserteile einen Anteil von mindestens

30% MTCC -Holz haben.

o Faserprodukte, die mindestens 30% der eingesetzten Frischfaser aus MTCC -Holz bestehen.

### **Vergleich MTCC – FSC, Bewertung**

Die Regelung zur CoC-Verifizierung und zur Kennzeichnung sind, wie auch von MTCC selbst festgestellt wird, weitgehend 1:1 vom FSC übernommen. Die wesentlichen Unterschiede zum FSC sind:

o Die Prozentregelungen beim MTCC sind wesentlich einfacher ausgestaltet als beim FSC. Eine gesonderte Betrachtung von Recyclingbestandteilen, die das FSC-System unnötig kompliziert, unterbleibt beim MTCC . Eine solche Betrachtung von Recycling-Bestandteilen hat auch im strengen Sinne mit einem System der Holzflussverifizierung für Holz aus nachhaltiger Forstwirtschaft nichts zu tun.

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o MTCC verlangt keine Angaben über die Herkunft des Holzes aus nicht-zertifizierten Quellen. FSC verlangt dem gegenüber von denjenigen Betrieben, welche Produkte mit einem Anteil von weniger als 70% FSC-Holz kennzeichnen wollen, einen Nachweis, dass das nicht-zertifizierte Holz auch nicht aus „kontroversen“ Quellen stammt.

Diese beiden zusätzlichen Anforderungen des FSC haben mit einer Holzflussverifizierung für Holz- und Holzprodukte aus zertifizierten Forstbetrieben nichts zu tun. Bei Recyclingprodukten ist die Herkunft des Holzes überhaupt nicht nachvollziehbar, ein glaubhafter Nachweis für die Herkunft des nicht-zertifizierten Holzes, wie FSC dies im Rahmen seiner „controversial sources policy“ verlangt, ist per definitionem nicht möglich. Eine Zertifizierung der nicht-zertifizierten Bestandteile ist ein Widerspruch in sich, die Erklärungen zur Vermeidung von Holz aus „kontroversen“ Quellen beruhen daher nur auf mehr oder weniger glaubwürdigen Eigendeklarationen, was jedoch nichts mehr mit dem von allen Zertifizierungssystemen geforderten Grundsatz der „Third Party Certification“ zu tun hat.

### **Im Ergebnis ist daher festzustellen:**

Das MTCC –System der Holzfluss-Verifizierung ist in seiner Grundstruktur mit dem FSC-System identisch, jedoch einfacher und zweckmäßiger aufgebaut, da es nicht ideologisch überfrachtet wurde.

Dies ist von der Natur der Sache her auch gar nicht anders möglich, da bei allen Systemen dieselbe Aufgabe zu lösen ist:

Dort wo FSC/ MTCC/ PEFC etc draufsteht, muss auch FSC/ MTCC/ PEFC etc drinnen sein.

## **Ungelöste Fragen**

Der MTCC ist ein nationales malaysisches System. Die Holzflussverifizierung erfolgt daher auch nur in Malaysia. Regelungen für eine MTCC -Zertifizierung außerhalb Malaysias liegen derzeit nicht vor. Es ist jedoch auch fraglich, ob dies sinnvoll ist. Viel mehr ist MTCC zu empfehlen, mit FSC und PEFC in Verhandlungen über eine gegenseitige Anerkennung der CoC-Zertifikate zu treten.

*ii/fw* , Berlin, 22. Juni 2003