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Cologne, 17 December 2020

Ref: Opportunity to comment on forthcoming Greenpeace International publication

Dear Mr Rosoman,

With reference to your email dated 11th December 2020, I am writing to respond to the forthcoming Greenpeace International Publication “Certifying Destruction”.

First of all, thank you for the opportunity to comment. Unfortunately, the report contains unacceptable false statements about the functions of certification systems in general and ISCC in particular which are damaging to the reputation of ISCC. Furthermore, the report is written in a biased way and seems to aim at making headlines with simple messages instead of constructively addressing content and discussing it appropriately.

The lack of research, the rather populist language and the fundamental rejection of sustainability certification systems like ISCC without seeking the dialogue and cooperation in advance, is appalling and undermines the credibility of Greenpeace. ISCC aims to be part of the solution and actively engages with NGOs, companies and research organizations to improve conditions and to support the transition to a sustainable bioeconomy and circular economy.

Our world has become highly complex and solutions are not always simple, not always black-and-white and not always easy to explain. Unfortunately, this has caused a worldwide increase of populism and ideology. We believe that it is inherently important that all stakeholders involved in the development of sustainable practices stick to the facts, enter into a constructive dialogue, combine their knowledge and address the challenges that we face - together.

We therefore ask you to review and change the current draft of the discussion paper and correct the misleading statements. We are willing and hoping to enter a constructive and solution-oriented dialogue with you about the role of certification and ISCC in particular.

Please find attached the following statements that need to be corrected. Please also find attached our comments in the document ‘ANNEX – Summary comparison of performance of certification schemes’.

Yours sincerely,

Andreas Feige
Managing Director
ISCC System GmbH

Attachment:

The following table aims to highlight statements made in the discussion paper, that are either:

- Statements that are polemically formulated and contain biased claims
- Statements that are incorrect
- Statements that present supposedly simple relationships and results, but whose context is more complex than presented here

Statements made in the Discussion Paper	Comments ISCC
Summary	
The scheme relies heavily on self-reporting (sustainability declarations and self-declarations for group members), and thus appears to offer wide scope for actors to game and cheat the system. There is no online database reporting on sustainable material produced, so independent validation of this information is not possible. The auditing process lacks transparency, and because companies choose and contract directly with CBs themselves, the independence of the CBs cannot be guaranteed.	This statement is wrong. ISCC document 203 contains strict requirements to ensure the traceability of materials throughout the entire supply chain. Under ISCC, materials can be traced back "step-by-step" through the entire supply chain according to the information provided on the Sustainability Declarations and by posing clear criteria for the documentation and management system of every economic operator in the supply chain (see ISCC 203, 3). Independent validation of information forwarded is taking place through independent third-party auditors recognised by a competent national public authority, or accredited against ISO/IEC 17065, by a national accreditation body which is a member of the International Accreditation Forum (IAF), by the bodies referred to in Article 4 of Regulation (EC) No. 765/2008, by bodies having a bilateral agreement with the European co-operation for Accreditation (EA), or by an accreditation body which is a full member or associate member of ISEAL. (see ISCC 103)
Due to serious flaws in governance, standards, traceability, auditing and implementation, this looks like a "tick in the box" scheme that helps to greenwash commodities for biofuels.	Based on our general feedback provided here, we consider this statement as false, factually unfounded and damaging to reputation. There is no basis for this assertion.
Governance and decision making	
- ISCC is governed by an association with more than 140 members, which it proclaims to include research institutes and NGOs. However, over 90% of its members are producers, processors, traders or others active in the biomass supply chain, with just four member organisations being NGOs. -The General Assembly is ISCC's highest decision-making body; all members participate. With such a high proportion of members being private companies from the biomass industry, ISCC is to all intents and purposes controlled by the industry.	The ISCC Association is a multi-stakeholder organization with currently 157 members. The ISCC Statutes clearly state that "Natural or legal persons willing to become members shall be prepared to support production, processing and utilisation of sustainable biomass and bioenergy in the context of the ISCC system and thereby make a contribution to climate protection and ecological and social sustainability." (ISCC Statutes §3 (2)) ISCC does not impose any constraint for members to join, except for the prohibition of Certification Bodies to join for reasons of independence. Important members from the NGO-sector are also

-The Board, which manages the affairs of the association, currently consists only of industry representatives and two researchers. NGOs are not represented.	participating in the ISCC Association. The statement 'ISCC is to all intents and purposes controlled by the industry' is one of many insinuations of this paper, that are devoid of any facts. Please also take the time to review ISCC's continuous engagement in benchmarks to improve, that are mainly conducted by NGOs indeed.
ISCC is a subscriber to the ISEAL Alliance, but not a full member	ISCC is a subscriber to ISEAL and references the ISEAL Codes in the ISCC Documents. See e.g. ISCC 102, 13 and the ISCC Impact Report. Further, as we do recognize that ISEAL is an important alliance to strengthen sustainability standards, we would like to highlight that a membership with a privat-sector initiative like ISEAL alone does not ensure the quality of a scheme. ISCC puts a high focus on the integrity of its operations and continuously works to improve the standard. For more details refer to ISCC 102, chapter 11, 12 and 13.
Standards	
(…) Cross-compliance, although it promotes environmentally friendly land management outcomes, is seen to be relatively weak from the standpoint of sustainability. This also suggests that Principles 2–6 in themselves are not particularly strong or ambitious. Indeed, the ISCC standard allows any company operating in a country that has ratified the fundamental core International Labour Organization (ILO) conventions to be considered in compliance with Principle 4 relating to compliance with human, labour and land rights 'as long as the auditor, based on a risk assessment does not come to a different conclusion'. -The ISCC standard includes no requirement for participatory mapping but does require a participatory social impact assessment and FPIC for any newly acquired lands. It largely relies on compliance with international conventions and relevant national and local laws to safeguard Indigenous rights.	ISCC Principles 2-6 were developed in a multi-stakeholder process and are continuously improved, mainly by engaging in benchmarks and by taking in the feedback from its members and external stakeholders. ISCC is accepted as a strong and reliable certification scheme by relevant NGOs in the fields of ecological and social sustainability, such as e.g. the IUCN, Textile Exchange, and is participating in further improving benchmarks on regular basis, e.g. by the WWF. ISCC is currently in the process of reviewing its standard and in this context will improve and strengthen also the requirements and criteria under Principles 2-6.
Traceability and transparency	
(…) The recipient is responsible for verifying that the supplier had a valid ISCC certificate at the time of dispatch. This approach clearly prone to abuse by unscrupulous actors – the scheme includes a 'plausibility check' that compares material output from a farm or plantation with its area and yields but given the variation in actual yields at the farm/plantation level this seems an insufficient safeguard to prevent unsustainable or illegally produced material being passed off as sustainable. While claiming to provide full traceability	This statement again is a claim based on assumptions/ subjective interpretations and without context. ISCC has very clear requirements for transparency and traceability throughout all certified supply chains. These are stated in ISCC document 203 in particular and complemented by ISCC documents 102, 103 and 201. In addition, ISCC continuously engages with its stakeholders, e.g. through Technical Committees and Working Groups to further strengthen the traceability and transparency of ISCC supply chains. Please refer also to the ISCC System Updates (particularly the

throughout the supply chain, ISCC acknowledges that 'some transactions may not be represented or hidden'	on from 19 October 2019 on this matter) to be able to evaluate the whole picture: https://www.iscc-system.org/update/01-october-2019/
There is no online database reporting on sustainable material produced, so independent validation of this information is not possible.	ISCC ensures full traceability through the strict documentation and verification of all relevant information on sustainability declarations, quantity bookkeeping and documentation management requirements. Online databases can be used by System Users wherever possible. Under ISCC EU in Germany, the Nabisy database is mandatory to be used by System Users.
ISCC requires mapping of plantation areas (but not the associated conservation areas) for independent smallholder certification, but this generally requires external technical support.	This statement is out of context. Every farmer under ISCC is required to provide information about the respective planting areas. Also, the entire land (agricultural land, pasture, forest, any other land) of the farm or plantation, including any owned, leased or rented land is subject to certification. (ISCC 201, 3.3) In order to reduce barriers for independent smallholders and to reduce implementation and certification costs, essential characteristics and features of the independent smallholder certification process are: Specific upfront registration program, GRAS monitoring tool, Group certification approach with Central Office (CO), Specific training for ISH via Tran-the-trainer concept, Access to funds / price premiums (ISCC 201-5, 1). After pre-registering, the company has to provide information on the considered region. This includes information such as geo-coordinates of the region and coordinates of the smallholder's land subject to ISCC certification. ISCC will conduct a risk assessment in order to identify risk areas (overlap of the considered region with Principle 1 areas, such as primary forests, peatlands or biodiverse grassland) (ISCC 205-1, 4.2).
ISCC has an online complaints procedure, but it is unclear what action is taken on complaints. No details – or even a list – of complaints is published on its website.	This is not correct. ISCC document 102, chapter 9 includes clear descriptions on how ISCC handles complaints and conflicts of any form. Further, please note that complaints can be submitted officially through the ISCC website. Please see here: https://www.iscc-system.org/process/how-to-submit-complaints/
(…) Summary reports are available on the ISCC website, but only for companies that have achieved certification. (…)	Summary audit reports: All ISCC Audit reports are available on the ISCC website: https://www.iscc-system.org/certificates/all-certificates/ Please also note that this is not only the case for all valid certificates, but also for withdrawn certificates.
Audits	
ISCC audits are conducted by auditors on behalf of CBs that have signed a cooperation agreement with ISCC. However, the	This evaluation is not acceptable. ISCC has in place very strict and clear requirements to ensure the independence of CBs and auditors. Refer to

independence of the audit process and thus the credibility of the certification is compromised by the fact that companies seeking certification can themselves choose any CB that has ISCC recognition and then contract directly with their chosen CBs to provide them with audit services.	ISCC Document 103, chapter 3 and see also the first point in this table. Further, the requirements here do not appear to be adequate to evaluate whether a CB is independent or not. In fact, a rotation of auditors/ or CBs needs to be closely monitored to ensure that no "CB hopping" takes place, allowing a System User to simply switch to another certification scheme, if non-compliances are detected for example under ISCC. This is also clearly stated in ISCC Document 103, 6: ISCC System Users may freely choose ISCC recognised CBs to perform a certification according to ISCC. System Users may also change from one CB to another CB for recertification. In this case, specific requirements with regards to the integrity of the system must be met. These measures are taken to address a System Users' certification history appropriately and to reduce the risk that CBs are changed with the intent to cover up infringements or violations of ISCC requirements ("CB hopping").
Audits are performed at different points in the supply chain and verify documentation, including sustainability declarations. But the sustainability of the material being delivered is determined solely on the basis of the audit of the grower.	The sustainability requirements under ISCC refer to producers and are transferred transparently and traceable throughout the entire supply chain, see also comment above regarding sustainability declarations. Further, GHG saving requirements are applicable for all elements in the downstream supply chain (except traders).
Desk-based risk assessments are conducted prior to each audit to identify potential issues. Where high risks are identified, a more extensive audit is conducted. However, there is a lack of transparency regarding the risks that are identified, and the active measures put in place to mitigate risk.	This statement again does not consider the full context. ISCC document 204 describes the full risk assessment to be done by auditors. General and specific risk indicators are provided, and chapter 4.2.2 describes how to evaluate this risk. In addition, auditors are asked to clearly define how they assessed the risk level in the audit procedure. (ISCC Audit procedure for Farms/Plantations)
Farms and plantations are audited and certified either as single sites or as part of a producer group. For group certification, ISCC uses a system of self-declaration in which individual growers report on their own compliance with sustainability criteria. Only the head office responsible for the group and a sample of group members are audited. This clearly reduces an audit to a tick-in-the-box exercise in which dishonesty can go undetected.	ISCC has clear requirements for group audits (see ISCC document 206). Samples are audited on-site by the auditor and its size is determined by the risk factor. Sampling is a validated approach, proven in practice.
Implementation and effectiveness	
An independent review focusing on the palm oil sector furthermore showed that ISCC has significant weaknesses, ranging from its domination by the private sector and related organisations to its lack of transparency, weaknesses	This review is referenced to be done by the Forest Peoples Program in 2017. Please note that ISCC has improved its system since then, especially focusing on strengthening the rights of Indigenous People (FPIC). Further, the Forest Peoples

in monitoring and evaluation and a lack of attention to Indigenous Peoples.	Program Benchmark included several wrong statements about the ISCC certification system itself. This issue was addressed by ISCC by the time this benchmark was done.

ANNEX – Summary comparison of performance of certification schemes

Aspect	Indicator	ISCC	Rainforest Alliance (cattle)	Fairtrade (cocoa and coffee)	Rainforest Alliance & UTZ merged	RSPO	ISPO/ MSPO	RTRS	FEFAC	Proterra	FSC	PEFC
Governance and decision-making	Majority non-business representatives in key decision making	No	No	Yes	No	No	No	No	?	No	Yes	No
	Member of ISEAL? [1]	No	Yes	Yes	Yes	Yes	No	Yes	No	Yes	Yes	No
Strength of Standards	No deforestation or forest conversion to plantations?	yes	Partial[2]	Partial[3]	Yes	Yes	No	Yes	Partial	Yes	Yes	Yes
	No other natural ecosystem conversion including peatland?	yes	Partial[4]	No	Yes	Partial	No	Yes	Partial	Yes	Partial	Partial

[1] Covers commitments to best practice for certification systems.
[2] Does not extend to production of feed purchased from third-party suppliers, which is not covered.
[3] Smallholder groups: yes (though rather ambiguously worded). Large producers: no.
[4] Does not extend to production of feed purchased from third-party suppliers, which is not covered.

	Is the cut off date for forest and natural ecosystem conversion strong?[5]	yes[6]	Yes[7]	N/A[8]	Yes[9]	No[10]	No[11]	Partial[12]	partial	Yes[13]	Partial[14]	No
	HCV protection and conservation areas?	no	Partial[15]	No?	Partial	Partial	No	Yes	No	Yes	Partial	No
	Does it require the principles for ecological agriculture/forestry?[16]	No	No	No	No	No	No	No	No	No	No	No
	Intact forest landscape (IFL) protection?	No	No?	No?	No?	Yes	No	Partial	No	Yes	Partial	No
	Requires respect for indigenous and land rights?	Partial	Partial	No	Yes	Yes	No	Yes	Partial	Yes	Yes	Partial
	Addresses labour rights?	No	Partial	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes

[5] Minimum cut off date 2015
[6] 2008
[7] Jan 2014 (Nov 2005 HCV)
[8] No cut off date
[9] Jan 2014
[10] Nov 2018
[11] None
[12] 2009 HCV and 2016
[13] 2008
[14] 1994 - good cut off date, but does not apply for ecosystems more broadly
[15] Does not extend to production of feed purchased from third-party suppliers, which is not covered.
[16] Greenpeace principles - https://storage.googleapis.com/planet4-international-stateless/2016/12/b254450f-food-and-farming-vision.pdf

	Requirements on associated companies applied at group level?	No	No	No	No	Partial	No	No	No	No	Partial	No
Transparency & traceability	Maps and ownership of sourcing areas made publicly available[17]?	No	No	No	No	Yes	No	Partial	No	No	Partial	No
	Summary reports or results of Audit assessments made public?	Partial	Yes	No	Yes	Yes	No	Yes	No	No	Yes	No
	Segregated or Identity Protected supply only?	No	Partial	No[18]	No	No	No	No	No	Yes	No	No
Audits[19]	Is there a requirement for a rotation of auditors and/or CBs? [20]	No	No?	No	No?	No	No	No	No	No	Yes	No
	Full independence of audits via 'fire-wall' between CB and company?	No	No?	No	No?	No	No	No	No	No	No	No

[17] Either published by the organization holding the certificate or on the certification scheme website

[18] Large producers: yes [except for tea]. Smallholder groups: yes for coffee, no for cocoa [also tea, cane sugar, juice]

[19] The three audit aspects are designed to show the highest standard of audit procedures.

[20] To mitigate lack in independence, objective and conflict of interest of the same auditor or CB over time

Implementation	Complaints and grievances mechanisms and cases made public	no	No	No	No	Yes	No	No	No	Partial	Yes	No
	No major breaches of standards including deforestation, human rights abuses (labour, land rights), HCVs destroyed, and in 'mix' materials	No	No	No	No	No	No	No	?	No	No	No
	Strong consequences - in proportion to the breach - for companies or CBs violating scheme standards?	No[21]	Partial	Partial	Partial	Partial	No	?	?	Yes	Partial	No
	Compensation implemented (Land rights compensation and or ecosystem restoration?)	No	No	No?	No?	Partial	No	Yes	?	Yes	No	No

[21] Companies that fail to meet 'Major Musts' or at least 60% of 'Minor Musts' will not be certified if the non-conformity is not corrected within 40 days or if a 'Critical Non-Conformity;' such as non-compliance to the EU RED sustainability criteria is detected

MALAYSIAN PALM OIL CERTIFICATION COUNCIL (MPOCC)
Company No: 1122153-D
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Our Ref: MPOCC / Greenpeace

Date: 12 February 2021

Mr Grant Rosoman
Greenpeace Forests Campaign
Global Solutions Senior Advisor

Dear Mr Rosoman,

COMMENTS ON FORTHCOMING GREENPEACE INTERNATIONAL PUBLICATION

Please allow me to refer to the above-mentioned matter.

2. First and foremost, I would like to express our appreciate to Greenpeace on the efforts of commissioning a study with regards to MSPO Certification Scheme. We are also grateful for the opportunity in giving our comments on the publication before it goes public. In the interest of transparency, we are sharing you our comments and the necessary data for your reference.

3. Kindly do find the attachment provided and do not hesitate to contact me for any further clarifications on the matter. We are gladly to have a better understanding and communications with regards to MSPO Certification Scheme.

Thank you.

Your sincerely,

Mr Simon Selvaraj
Acting CEO

Comment on forthcoming Greenpeace International publication

Indonesian Sustainable Palm Oil / Malaysian Sustainable Palm Oil (ISPO/MSPO)

210205 Discussion Paper Certification Schemes MSPO-ISPO		
No	**Subject**	**MPOCC Comment/Feedback**
1	**Summary** ISPO and MSPO are national standards created by the Indonesian and Malaysian governments together with the palm oil industry. They are based on existing laws and regulations, with limited input from and involvement of civil society or NGOs. The standards are relatively weak, lacking core requirements on no deforestation (such as via the HCSA), no expansion onto peatlands, implementation of HCV approach, comprehensive FPIC and respect for Indigenous and local community rights, protection of smallholders' and workers' rights or prohibition of the use of fire. Neither scheme has a functional chain of custody system for its certified products, nor do they require transparency. While both schemes are nominally mandatory, providing them with far greater reach than voluntary schemes, they have weak accreditation oversight for their certification bodies and weak implementation of systems for compliance with their standards.	MSPO Supply Chain Certification Standards, SCCS (or functional chain of custody system for its certified products) was launched and implemented in 2019. Today, MSPO SCCS is the most transparent and reliable system in Malaysia that delivers the traceability-to-plantation (TTP) mechanism via MSPO-Trace platform (www.mspotrace.org.my). Certified users can see the traceability link, and the public can see it through the use of the MSPO track ID, which appeared on the product label.

2	**Governance and decision making** ● ISPO and MSPO are national government and industry initiatives. They are based on national-level laws and regulations enabling palm oil processors and growers to claim 'sustainability', rather than comprehensive sets of standards and quality assurance systems. ● The dominance of industry and government in the structure and governance of the MSPO system leaves little room for meaningful input from and participation by recognized stakeholders and organisations.2 Nonetheless, MSPO standardssetting processes are stronger due to MSPO's greater inclusivity and multistakeholder oversight committee,3 compared with ISPO's very opaque and poor standards-setting governance.4 ● Neither MSPO nor ISPO is a member of ISEAL	Currently, no umbrella body recognises a comprehensive or complete set of standards for palm oil as compared to timber with PEFC. The benchmark used in this report to justify comprehensive sets of standards is rather non-empirical. In terms of quality assurance systems, MSPO auditing are operated by 3rd party verification system through its accredited Certification Body. There is also a need to have continuous improvement in place by the standards user. In term of structural governance, as stated in its certification system document, MSPO Certification Scheme operated based on its Institutional Arrangement which consists of Malaysian Palm Oil Certification Council (MPOCC) as a scheme owner, Jabatan Standards Malaysia as a National Accreditation Body, and the 3rd party independent Certification Body. MPOCC is governed by Board of Trustees represented by the government, industry associations, environmental NGOs, civil society and smallholders associations.

		MPOCC suggests this remark to be sperated between ISPO and MSPO. Various stakeholders' have participated under the current setup of the Technical Committee and Working Group of MSPO as below: 1. Government agencies 2. Industry Associations (Upstream & Downstream) 3. Smallholders organisations 4. Environmental NGOs 5. Indigenous People Organisations 6. Workers Union Organisations 7. Academia/R&D Institutions
3	**Standards** ● MSPO standards are stronger on paper than ISPO's with regard to rights and FPIC,7 but they do not include requirements on no deforestation or peatland protection.8	It is unnecessary to write "stronger on paper" as it seems to deny that the impact of MSPO standards on the ground is massive compared to other palm oil sustainability certification in Malaysia. On top of that, the requirement on "no deforestation" did cover in the MSPO standards. The only difference is the degree of the "no deforestation" requirement. *4.7.1.1 Oil palm shall not be planted on land with high biodiversity value unless it is carried out*

		in compliance with the National and/or State Biodiversity Legislation. Definition of HBV as stated in MS2530-3:2013; Land that has one of the following status: a) Primary forest. b) Areas designated by law or by the relevant competent authority to serve the purpose of nature protection. c) Areas for the protection of rare, threatened or endangered ecosystems or species recognized by international agreements or included in lists drawn up by intergovernmental organizations. "Deforestation" shall be partially complied with by MSPO. Besides, the Malaysian government has taken a quantum leap with the issuance of the new policy as follows: • Limit the nation's oil palm planted area to 6.5 million hectares by 2023; • Implement the ban on new oil palm cultivation in peat lands and impose stricter conditions on existing oil palm in this area;

		• Implement the ban on conversion of Permanent Forest Reserves to oil palm or other agricultural crops; and • Provide the official map of oil palm planted areas nationwide for public access and public reference to enhance the transparency of information. As for planting on peatland, stringent requirements are imposed on the existing planting. As for HCV and FPIC, the committee (TC and WG) of MSPO currently reviews the adoption of HCV and detailed requirement of FPIC to be incorporated in the upcoming revised MSPO standards.
	2 WWF Malaysia (2018) -Page 1	This is an obsolete document issued by WWF Malaysia as MSPO was improved since 2019.
4	**Traceability and transparency** ● MSPO has a very weak chain of custody system that makes it difficult to guard against uncertified products entering the supply chain.12 ● ISPO, at present, does not have a chain of custody system; the certification applies only to plantation growers.13	The statement on a weak chain of custody is wrong as MSPO now consists of Supply Chain Certification Standards (SCCS). Today, MSPO SCCS is the most transparent and reliable system in Malaysia that delivers the traceability-to-plantation (TTP) mechanism via MSPO-Trace platform (www.mspotrace.org.my).

	● Neither ISPO nor MSPO has transparency requirements for assessments, certified areas, disputes and complaints or audit results.14	The movement of the certified and non-certified products are depicted through the "fishbone" diagram. Certified users can see the traceability link, and the public can see it through the use of the MSPO track ID, which appeared on the product label.
5	**Audits** ● MSPO CBs are accredited by Standards Malaysia, the national accreditation body.17 ● MSPO does not require risk-based auditing or an adjustment to audit intensity in relation to issues found.18 It allows unannounced audits but does not require them.19 For ISPO, the requirements on both of these fronts are unclear.20	**Standards Malaysia** has been accepted as a signatory to various regional and international arrangements. At the regional level , Standards Malaysia is a signatory to the Asia Pacific Laboratory Accreditation Cooperation Mutual Recognition Arrangement (APLAC MRA) and Pacific Accreditation Cooperation Multilateral Recognition Arrangement (PAC MLA). As for at the international level, Standards Malaysia is a signatory to the International Laboratory Accreditation Cooperation Mutual Recognition Arrangement (ILAC MRA) and International Accreditation Forum Multilateral Recognition Arrangement (IAF MLA). The accreditation of Certification Bodies are linked with document ISO-IEC-17021-2015 that requires risk based auditing. It is clearly stated under clause 4.8.

		The unannounced audit is allowed under the current system via an agreement between scheme owner (MPOCC) with Accredited Certification Body (ACB).
6	**Implementation and effectiveness** The MSPO scheme does not require compliance with all standards, but rather requires that internal audit procedures and results are documented and evaluated, in order to implement necessary corrective action through continuous improvement.26	MSPO adopt several standards thus do not require to have a specific clause in a MSPO standard. The standards include Quality Management System (QMS), Environmental Management System (EMS), and Health & Safety Management System (OHS).
201105 Certification report - TABLE		
	Indicator Majority nonbusiness representatives in key decision making. Member of ISEAL? 1	**General comment: MPOCC suggests splitting ISPO and MSPO. This is due to the distinctive difference between ISPO & MSPO.** In terms of governance for decision making, MPOCC is operating the MSPO Certification. The Board of Trustees governs MPOCC as a representative from the government, NGOs, sivil society, and smallholders.
	No deforestation or forest conversion to plantations?	**“Deforestation” shall be partially complied with by MSPO.**

		The requirement on “no deforestation” did cover in the MSPO standards. The only difference is the degree of the “no deforestation” requirement. *4.7.1.1 Oil palm shall not be planted on land with high biodiversity value unless it is carried out in compliance with the National and/or State Biodiversity Legislation.* Definition of HBV as stated in MS2530-3:2013; Land that has one of the following status: a) Primary forest. b) Areas designated by law or by the relevant competent authority to serve the purpose of nature protection. c) Areas for the protection of rare, threatened or endangered ecosystems or species recognized by international agreements or included in lists drawn up by intergovernmental organizations.

18th December 2020

Dear Grant,

Thank you for sharing the report and providing us with an opportunity to comment ahead of the publication of the upcoming Greenpeace International report. Below, we have provided several challenges we have with the general framing of the report as well as several specific citations.

First, **the report contains an extensive piece on the Rainforest Alliance cattle certification program, but this program is in the process of being discontinued.** We have learned that our impact on the cattle sector and its resulting deforestation is better suited for other interventions that focus on strengthening incentives, government policy, accountability for sustainable practice and even consumption, including the Accountability Framework initiative and Landscale. There are 5 certificate holders currently transitioning out of the program at the completion of their certification cycles, but no new certificates are being issued since June 2020. An analysis of the Cattle Program is therefore not helpful content in our view, and we suggest you remove.

Second, **the report implies that certification aims to pre-empt or replace effective regulatory frameworks (see p. 2, last paragraph).** This is certainly not the case. Voluntary sustainability standards alone are not enough to make more sustainable supply chains a reality, something we as the Rainforest Alliance have been very outspoken on.

Since the merger with UTZ in 2018, we have developed an ambitious strategic plan that recognizes the need for a suite of tools and the alliance of many to achieve the impact we are striving for. A key part of this has been our work to reimagine certification as a journey of *continuous improvement,* fortified by advanced monitoring techniques, robust, transparent data flows and complementary interventions. Rather than a pass-fail model focused solely on compliance, our new 2020 certification program will measure and incentivize progress along the entire sustainability journey, identifying both areas of high risk and high performance.

To support this, we are also working in a number of critically important landscapes, including the Peten in Guatemala, which has seen near net-zero deforestation rates in the last 15 years. Furthermore we are active advocates working to influence policy and implementation to advance our key sustainability priorities—as well as increased commitments and financial investment from both governments and companies. We also work with a number of company partners to develop tailored supply chain services that guide them on their own sustainability journeys, driving innovations in our broader suite of programs, including certification.

We recognize that standards need effective policies and other mechanisms to promote sustainable commodity production and sourcing, thus removing harmful incentives that may promote irresponsible and illegal production. **Greenpeace knows that the Rainforest Alliance is an ally in this position**, not least because we have just collaborated on the #together4forests campaign with 100+ NGOs in the context of the European Union, calling for a strong forest law to be adopted. We also worked very closely together for two years to develop the Accountability Framework.

We see the dichotomy between certification OR regulation as harmful and would be eager to work together on ensuring increased understanding on the importance of a smart mix of approaches in the global debate on supply chain regulation. We also urge you to ensure this is clarified in the report.

After these two more general considerations, we would also like to suggest reformulations in some of the specific points raised in the report:

- On **not making available maps of production areas** – this is inaccurate. We do share this information publicly, for both UTZ and RA farms. Currently this is using GPS points and not polygons; however, we are working in our new standard on the collection and use of polygon data and looking at supporting producers and supply chain actors to be able to accurately provide this information. You can consult that information here: https://www.rainforest-alliance.org/impact

- On **considerations regarding the UTZ program**, The UTZ standard will no longer exist after July 2021, and therefore this information will very soon be outdated. Several issues were identified in this soon-to-be phased out standard - such as not making audit reports public, permitting clearing of secondary forest with the relevant title and/or permits, and requiring producers to resolve any unresolved land disputes within a reasonable period of time – that have been reviewed and strengthened in the new 2020 Standard.

    - A public summary of the audit report will be available on the Rainforest Alliance website.
    - The new Rainforest Alliance Sustainable Agriculture Standard follows a broader approach, aiming to conserve both forests and all natural ecosystems.
    - Activities diminishing the land or resource use rights or collective interests of indigenous peoples and local communities, including High Conservation Values (HCVs) 5 or 6, are conducted only after having received free, prior and informed consent (FPIC) following the Rainforest Alliance FPIC annex.

- On h**aving the new program drop prohibition on HCV destruction and moving to assess and address** – this is inaccurate. We do indeed move to the Assess and Address approach for human rights issues, but not on our ecosystem conversion criteria. The 2020 Program is aligned with the Accountability Framework Initiative and with the HCV Network, both of which Greenpeace has been heavily involved with, as can be confirmed here: https://hcvnetwork.org/rainforest-alliances-revamped-standard-to-strengthen-protection-of-high-conservation-value-areas/

- On **stating that the new combined standard largely follows the Rainforest Alliance's older standard** – we disagree with this point, as the new standard is much more than a combination of the two previous ones. The new standard sets ambitious new requirements and builds in a variety of innovations that include:

    - **Greatly improved the GIS capacity** to identify risk of deforestation and encroachment in protected areas on certified farms. The new standard requires certificate holders to submit location data – GPS points or polygons – for all farms prior to certification. Before each audit, the certificate holder and auditors receive a map indicating high, medium or low risk

of deforestation and/or encroachment in protected areas for each certified farm, thus better informing the assurance activities.

- The 2020 Certification program **not only prohibits deforestation but also the destruction of all natural ecosystems, including wetlands and peatlands**—meaning more land will be protected. The new Rainforest Alliance Sustainable Agriculture Standard does not allow the destruction or conversion of natural ecosystems since January 1st, 2014. If cases of conversion after the cutoff date are found, they are, in general, not eligible for certification, except for minor cases, which can be remediated. The new standard also requires farmers to increase native tree cover on existing farms and in agroforestry systems or conservation lands to ensure that farming not only has a minimal negative impact, but that it also generates positive impacts on biodiversity, climate, and the long-term sustainability of the landscape. More information on the deforestation requirements in particular can be found here: https://www.rainforest-alliance.org/business/wp-content/uploads/2020/06/2020-program-deforestation.pdf

- Rainforest Alliance continues to introduce **improvements to our assurance system** to improve the detection and remediation, or – where necessary – sanction of non-compliance with our standard requirements. The 2020 Certification Program includes stricter rules for auditors and a minimum audit duration based on risk, so that auditors can target verification of non-compliance more effectively. This year we have also piloted a new system for the direct allocation of audits to address the risk of conflict of interest for auditors to robustly audit certificate holders who are clients for their services. **Audits are allocated on a risk basis** so that the greatest number of audits and certificate holders with the highest level of risk are allocated to the best performing Certification Bodies which incentivises CBs to improve audit quality. The pilot was implemented in Cote d'Ivoire and Ghana this year.

- The 2020 Certification Program provides farms and businesses with a set of tools to assess their own sustainability risks and actively plan management actions and necessary investment to address them. The 2020 Sustainable Agriculture Standard includes mandatory improvement levels for a number of sustainable practices. It also allows Certified producers and businesses who want to go beyond the core standard requirements to set their own targets based on the risks they identify and measure their performance in addressing them. **We see this as an important way to incentivise and reward farmers and businesses who want to take their sustainability performance to the next level** and make market-facing claims in this regard.

- The 2020 Certification Program also includes the newly devised Shared Responsibility approach. Shared Responsibility is a recognition that sustainability is a long-term journey, and that in order to make sectors truly sustainable, all supply chain actors have a role to play. An inclusive supply chain is one where both the value and the risks are shared. This requires a shift to a system where the producers' costs and investments are covered and their efforts to make their farms and production more sustainable are rewarded. To help realize this vision, our 2020 Sustainable Agriculture Standard outlines two requirements for

the buyers of Rainforest Alliance Certified commodities: the Sustainability Differential and Sustainability Investments.

These are just several of the key improvements and innovations in the new standard. Following on from your call with Alex Morgan on December 17th, I suggest we reconvene in the second week of January to discuss these points and our new standard in more detail. Would the 12th, 13th or 14th of January work? I understand it will need to be timed in the evening European time and afternoon in US Eastern time. Please let us know your preference for a follow-up discussion.

Kind regards

Emma Harbour
Director, Advocacy & Themes

Attachments

- Appendix 1: Tracked changes on Annex – Summary comparison of performance of certification schemes.

Links

- Rainforest Alliance position:
  - Position paper - Deforestation
  - White paper - Regenerative Agriculture
  - White paper – the need for due diligence
- 2020 Rainforest Alliance Agricultural Standard
  - Farm Requirements
  - Supply chain requirements
- Climate Smart cocoa – a joint project developed with CIAT using climate risk maps to identify relevant areas of engagement and investment in smallholder adaptation to climate change in cocoa. We are working on a similar approach in coffee and tea.
- Guidelines for companies on communication about Sustainability

ANNEX – Summary comparison of performance of certification schemes

Aspect	Indicator	ISCC	~~Rainforest Alliance (cattle)~~	Fairtrade (cocoa and coffee)	Rainforest Alliance & UTZ merged	RSPO	ISPO/ MSPO	RTRS	FEFAC	Proterra	FSC	PEFC
Governance and decision-making	Majority non-business representatives in key decision making	No	~~No~~	Yes	No	No	No	No	?	No	Yes	No
	Member of ISEAL? [1]	No	~~Yes~~	Yes	Yes	Yes	No	Yes	No	Yes	Yes	No
Strength of Standards	No deforestation or forest conversion to plantations?	yes	~~Partial~~[2]	Partial[3]	Yes	Yes	No	Yes	Partial	Yes	Yes	Yes
	No other natural ecosystem conversion including peatland?	yes	~~Partial~~[4]	No	Yes	Partial	No	Yes	Partial	Yes	Partial	Partial

[1] Covers commitments to best practice for certification systems.

[2] ~~Does not extend to production of feed purchased from third-party suppliers, which is not covered.~~

[3] Smallholder groups: yes (though rather ambiguously worded). Large producers: no.

[4] ~~Does not extend to production of feed purchased from third-party suppliers, which is not covered.~~

	Is the cut off date for forest and natural ecosystem conversion strong?[5]	yes[6]	~~Yes~~[7]	N/A[8]	Yes[9]	No[10]	No[11]	Partial[12]	partial	Yes[13]	Partial[14]	No
	HCV protection and conservation areas?	no	~~Partial~~[15]	No?	~~Partial~~ YES	Partial	No	Yes	No	Yes	Partial	No
	Does it require the principles for ecological agriculture/forestry?[16]	No	~~No~~	No	No[1]	No	No	No	No	No	No	No
	Intact forest landscape (IFL) protection?	No	~~No?~~	No?	~~No~~?/A [2]	Yes	No	Partial	No	Yes	Partial	No
	Requires respect for indigenous and land rights?	Partial	~~Partial~~	No	Yes	Yes	No	Yes	Partial	Yes	Yes	Partial
	Addresses labour rights?	No	~~Partial~~	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes

[5] Minimum cut off date 2015
[6] 2008
[7] ~~Jan 2014 (Nov 2005 HCV)~~
[8] No cut off date
[9] Jan 2014
[10] Nov 2018
[11] None
[12] 2009 HCV and 2016
[13] 2008
[14] 1994 - good cut off date, but does not apply for ecosystems more broadly
[15] Does not extend to production of feed purchased from third-party suppliers, which is not covered.
[16] Greenpeace principles - https://storage.googleapis.com/planet4-international-stateless/2016/12/b254450f-food-and-farming-vision.pdf

	Requirements on associated companies applied at group level?	No	~~No~~	No	No	Partial	No	No	No	No	Partial	No
Transparency & traceability	Maps and ownership of sourcing areas made publicly available[17]?	No	~~No~~	No	~~No~~Yes	Yes	No	Partial	No	No	Partial	No
	Summary reports or results of Audit assessments made public?	Partial	~~Yes~~	No	Yes	Yes	No	Yes	No	No	Yes	No
	Segregated or Identity Protected supply only?	No	~~Partial~~	No[18]	No	No	No	No	No	Yes	No	No
Audits[19]	Is there a requirement for a rotation of auditors and/or CBs? [20]	No	~~No?~~	No	Yes~~No~~ [3][4]~~?~~	No	No	No	No	No	Yes	No
	Full independence of audits via 'fire-wall' between CB and company?	No	~~No?~~	~~No~~Yes? [5]	No?	No	No	No	No	No	No	No

[17] Either published by the organization holding the certificate or on the certification scheme website

[18] Large producers: yes [except for tea]. Smallholder groups: yes for coffee, no for cocoa [also tea, cane sugar, juice]

[19] The three audit aspects are designed to show the highest standard of audit procedures.

[20] To mitigate lack in independence, objective and conflict of interest of the same auditor or CB over time

Implementation	Complaints and grievances mechanisms and cases made public[6]	no	~~No~~	No	No	Yes	No	No	No	Partial	Yes	No
	No major breaches of standards including deforestation, human rights abuses (labour, land rights), HCVs destroyed, and in 'mix' materials	No	~~No~~	No	No	No	No	No	?	No	No	No
	Strong consequences - in proportion to the breach - for companies or CBs violating scheme standards?	No[21]	~~Partial~~	Partial	~~Partial~~ Yes	Partial	No	?	?	Yes	Partial	No
	Compensation implemented (Land rights compensation and or ecosystem restoration?)	No	~~No~~	No?	~~No?~~Partially[7]	Partial	No	Yes	?	Yes	No	No

[21] Companies that fail to meet 'Major Musts' or at least 60% of 'Minor Musts' will not be certified if the non-conformity is not corrected within 40 days or if a 'Critical Non-Conformity;' such as non-compliance to the EU RED sustainability criteria is detected

RSPO Comments on the Greenpeace Report "Certifying Destruction"

Pg	Paragraph	Comment	Supporting Documents
3	and to some degree the Round Table for Sustainable Palm Oil (RSPO)16	Please amend 'Round Table for Sustainable Palm Oil' to '**Roundtable on** Sustainable Palm Oil'	
9	Furthermore, larger and more powerful actors such as agribusiness corporations and global traders are often in a position to dictate standards to smaller and less powerful producers, which may end up being excluded from certification schemes altogether if they cannot afford the investment necessary for the certification process. This has been the case for soya47 and for independent palm oil smallholders.48	We fully acknowledge the importance of having voices and representation of smallholders and smaller producers in the development of RSPO standards, to ensure these are accessible and feasible for them. The development of the RSPO Independent Smallholder (ISH) Standard was guided by the following two key principles: i) principle of continuous improvement (stepwise approach); ii) the feasibility of adopting sustainable practices through the upcoming development of various supporting tools and systems – to simplify assessment and verification. Additionally, the RSPO Smallholder Support Fund (RSSF) was established in 2013 to assist smallholders in getting RSPO certified, reducing cost implications through funding. Between 2013-2018, RSSF disbursed RM 20.1 million to smallholders programmes, which supported 18,100 smallholders across five major oil palm producing regions: Indonesia, Malaysia, Thailand, Africa and Latin America. We note that there has been a 17% increase in membership for ISH since January 2020. The ISH standard was adopted by RSPO members in November 2019 and 11 ISH groups have since January 2020. In addition, A Medium Grower Taskforce (MGTF) was established to oversee the classification of palm oil producers and lead the development of a certification system and/or certification standards for medium-	Medium Grower Task Force https://www.rspo.org/about/supporting-bodies#medium-grower-task-force

		sized growers. We note that one of the key challenges that remains is to effectively facilitate and support full participation of medium- and small-size farmers. This is something we are committed to improving.	
12	Context. The FSC relies on this flexibility for the implementation of its global Principles and Criteria for Forest Stewardship,60 the RSPO allows 'national interpretations' of its Principles and Criteria61 and the PEFC is simply a collection of different national standards.62 While some scope for adaptation to national contexts is an advantage, this approach can result in a weakening of standards where the national standards depart considerably from the global principles and criteria.	The RSPO National Interpretation (NI) process, a multi-stakeholder consultation process, is to promote better alignment of the applicability of RSPO Standards to national laws and policies. Clause 9.2.5 of RSPO's SoP for Standards Settings and Review states the procedures of which NI development shall be in compliance with. It is important to note that NI processes are not allowed to change any of the principles and criteria. NI can only interpret the indicators. Yet, indicators may be strengthened and raised from non-critical to critical indicators, however shall not be reduced from critical to non-critical indicators. In the legal context, it also clarifies that when there is a conflict between an RSPO P&C Indicator and a legal requirement, the higher/stricter requirement shall prevail.	RSPO SOP for Standards Settings & Review https://rspo.org/key-documents/certification/standards-setting-process National Interpretations https://rspo.org/certification/national-interpretations
19	Such proposals are not available to stakeholders for review, so there is no way of independently assessing whether the disclosures on which they are based are full and accurate.	We acknowledge the RaCP webpage is undergoing enhancements to make this process more transparent. It should be noted however that the calculation of liability is done through an external review known as Land Use Change Analysis (LUCA), serving as the initial step of the RaCP. More information can be found here, including a RaCP tracker.	RSPO Remediation and Compensation Procedure https://rspo.org/certification/remediation-and-compensation#overview
19	Such proposals are not available to stakeholders for review, so there is no way of independently assessing	Please note that any member of any of a Working Group, Task Force, or Standing Committee, including the Complaints Panel (CP), must recuse themselves where there is	https://askrspo.force.com/Complaint/s/procedures

	whether the disclosures on which they are based are full and accurate. In this case, the limitations of the RSPO's reliance on members' self-policing are potentially compounded by the fact that Bumitama has a representative on the RSPO Complaints Panel113 (which adjudicates on complaints against members), raising questions about what influence the company may be able to bring to bear to hinder investigations into and complaints about its own operations.	a real or perceived conflict of interest. At the beginning of each CP meeting, CP members are required to declare any conflict that is perceived to be in existence with an RSPO member. This is not only for members or Complainants who are subject to Complaints but instead for all existing RSPO members. If there is a potential conflict then such conflicted CP member(s) are asked to recuse themselves during the deliberation of Complaints and will have no say or any part in the decision-making process of the Complaint. This requirement is also set out in the RSPO Complaints and Appeals procedures.	
22	On paper, the RSPO has strong requirements with regard to community and human rights, including FPIC, participatory mapping and a documented grievance procedure. However, as RSPO member Forest Peoples Programme admits, industry non-compliance is prevalent	We acknowledge that work is needed to close gaps in our assurance system, which our revamped Assurance Standing Committee is working on, but stating that it is "prevalent" is a generalisation and oversimplification of the issue.	
23	The RSPO is a multi-stakeholder body in whose establishment WWF played an important role.117 However, over time its membership has become dominated by business118 and it has no structures or rules to ensure other members, such as civil society and environmental organisations, are fairly represented in most of its structures, including in the General Assembly's decision making.119	Please note that the reference to this statement by Colchester and McInnes is outdated i.e. 2016. There is a Code of Conduct to govern the conduct of members and that decision making is based on consensus i.e. no decision made if there is a sustained objection. For Working Groups, Task Forces, or Standing Committees, including the Complaints Panel, it is a prerequisite that these groups are represented. In fact, without representation from them and oil palm growers, Working Groups, Task Forces, or Standing Committees will not be formed. For RSPO General Assembly's, the membership adopted a resolution that will ensure balanced representation in the GA voting process. Therefore, the ENGO and SNGO sectors will have a combined 25% voting representation although the said sectors represent less than 3% of eligible voters. The new voting format was implemented in our most recent general assembly - GA17.	

23	In November 2018, the RSPO made the significant step of voting to incorporate 'no deforestation' and the HCSA into its palm oil certification standards.124 Prior to the 2018 amendments, RSPO standards required the protection of only some types of forest ('primary' forest and HCV areas). Members that are growers are now also required to protect areas of natural forest (HCS forest),125 with a cut-off date 15 November 2018. However, this change is still being phased in,126 and given reports of past implementation failures127 it remains to be seen if enforcement measures will be fully and robustly put in place on the ground. Additionally, the RSPO has yet to develop guidance for implementation of the HCSA in high forest cover landscapes (HFCLs), posing a risk that exemptions allowing some continued deforestation may be made for some countries.128	The joint collaboration between RSPO and HCSA - the RSPO No Deforestation Joint Steering Group (NDJSG) to oversee the development of procedures, methodologies and guidance for the implementation of specific procedures in High Forest Cover (HFC) countries and landscapes is challenged immensely to balancing sustainable livelihoods and poverty reduction with the need to conserve, protect, and enhance ecosystems. The challenge remains around 'how to halt deforestation in High Forest Cover (HFC) countries and landscapes. HFC countries require economic opportunities that enable communities to choose their own development path, while providing socio-economic benefits and safeguards'. A note, 7.12.3 (C) In High Forest Cover Landscapes (HFCLs) within HFC countries, a specific procedure will apply for legacy cases and development by indigenous peoples and local communities with legal or customary rights, taking into consideration regional and national multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.	
23	The 2019 RSPO Independent Smallholder Standard has not yet incorporated the HCSA; it currently relies on HCV probability mapping to identify forest risk areas and voluntary commitments by farmers to not clear forest.129	We acknowledge that progress is slow but it is a difficult challenge as we need to balance smallholder livelihoods and conservation. However, improvements are being made and the Task Force established in September 2020 and has been working actively on developing a simplified HCV-HCS tool Principle 4 of the ISH Standard incorporates both HCV and HCS concepts. Upholding one of our principles for an inclusive and robust system ensuring the feasibility of ISH's adopting and implementing the requirements, the Smallholder Standing Committee remains committed to improving existing Simplified HCV toolkits, to incorporate HCS forests. While the simplified combined HCV-HCS tool	

		is being developed, the ISH No Deforestation Task Force has created interim measures and procedures to allow for development only within 'low risk' areas (e.g. bare land, pastures, existing agricultural lands, ex-infrastructure etc), while a procedure to properly identify HCS is developed. The sentence misleads readers to think that it is still possible for ISH to clear forests under the ISH Standard, but this is not the case.	
23	The independent smallholder standard is targeted at large groups of organised smallholders with a group manager to facilitate. It is not well adapted to independent smallholders (< 4 ha)132 in small cooperatives, so will not provide a way into certified markets for them.13	It should be noted that SPKS is not a member of the RSPO. We acknowledge that more must be done to ensure greater inclusion of smallholders in sustainable solutions that positively impact their livelihoods. Last year, our membership adopted the RSPO Independent Smallholder (ISH) Standard, designed to address the needs and challenges of independent smallholders for inclusion in the RSPO system. Through a step-wise approach to certification and by addressing the cost barriers, RSPO seeks to provide greater support for smallholders. Training and support for smallholders and group managers is a fundamental component of the RSPO ISH Standard as the standard assumes that not all smallholders have the capacity and resources to comply with all indicators upon entry (Eligibility phase). As such, the ISH Standard presents a phased approach and includes a substantial training component, presented as indicators that require independent smallholders to receive training. The RSPO Smallholders Trainers Academy (STA) was launched last year to train and build capacity of smallholders to organise and manage themselves in a group RSPO has also been working to support smallholders in in the wider context through the RSPO Smallholder Support Fund (RSSF) aimed at reducing barriers for certification and to reduce the cost of certification, as well as the RSPO Smallholder Engagement Platform (RSEP), and simplified tools for assessments like HCV, SEIA etc.	
24	RSPO standards on peat have improved, with all expansion on peat now prohibited.130 However, the	Indicator 7.7.5 requiring drainability assessment to be conducted to set the time frame for future replanting, as well as for phasing out of oil palm cultivation at least 40	RSPO Resources: Peat https://www.rspo.org/resources/peat

	standards still do not require the rewetting and/or restoration of the millions of hectares of drained peatlands that have oil palm planted on them, which is essential for climate change mitigation.131	years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. Peatlands identified as priority for phasing out for conservation, based on the findings of respective drainability assessment, are to be set-aside and be managed as per the requirement under Indicator 7.7.7. of the 2018 P&C. RSPO P&C (2018) Indicator 7.7.7 (C) states: All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2018) and associated audit guidance. All other existing oil palm on peatlands are to be managed in accordance to the 'RSPO manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance (Indicator 7.7.6).	RSPO Drainability assessment procedure: https://www.rspo.org/resources/archive/931
25	Many members reportedly fail to meet all the membership requirements, including having all their concessions certified.157	A 100% certification requirement has been enforced since 2017 in the certification systems document. Existing members are required to certify all the concessions by 2023. At a minimum, all estates and mills shall be certified within five years after obtaining RSPO membership. Any new acquisitions shall be certified within a three-year timeframe. Any deviation from these timelines requires approval by the RSPO Secretariat.	

Greenpeace certification report:

Extracts referencing PEFC:

Some of the weaker schemes have taken steps to make themselves appear equivalent to the stronger schemes.[1] In some cases this ultimately has a positive effect, with the less robust schemes eventually becoming more similar to the stronger ones.[2] For example, in some cases the weaker Programme for the Endorsement of Forest Certification (PEFC) has adopted some FSC policies and standards; indeed, in a few countries its forest management standards are identical to the FSC's, with their assessments being carried out jointly[3] Meanwhile, other countries' PEFC systems often remain drastically weaker than the FSC, and many certification systems have encouraged misplaced consumer confidence in schemes that do not in fact deliver the expected level of 'sustainability' assurance.

Programme for the Endorsement of Forest Certification (PEFC)

PEFC is considered a weak and industry dominated certification scheme and thus this report provides only a limited assessment. According to PEFC it is a global alliance of national forest certification systems, ostensibly created to address 'the specific requirements of small- and family forest owners'. It is dominated by governments and economic interests, and the governance structures of PEFC-endorsed schemes do not allow the full and balanced representation of economic, environmental, social and Indigenous interests.

While they have gradually improved, the PEFC's international standards, to which endorsed schemes are meant to conform, are still weak and insufficient in crucial areas. For example, they still do not address IFLs, do not recognize and protect most other HCVs, do not sufficiently prohibit conversion of forests to plantations, do not consistently recognize and protect Indigenous Peoples' rights, and do not address certified companies' controversial practices outside of certified forests.

Some important PEFC-endorsed national schemes even fall short of the PEFC's international expectations. For example, the standards of the PEFC scheme for North America, the Sustainable Forestry Initiative (SFI), have no meaningful prohibitions against forest conversion and use of GMOs, do not require Free Prior Informed Consent (FPIC) for operations affecting Indigenous Peoples' lands and rights, and do not meaningfully recognize and protect HCVs, rare and endangered species including Canada's iconic woodland caribou, old growth, and other environmental values. The certification of highly controversial forestry practices has also been an ongoing concern with a number of PEFC-endorsed schemes around the globe, including with regard to conversion, HCVs, and community and Indigenous Peoples' rights.

[1] Changing Markets Foundation (2018)
[2] OECD (2016) pp.11-12
[3] PEFC (2017, 12 June)

As a second example, the Indonesian Forestry Certification Cooperation (IFCC) in Indonesia, is weak when it comes to the protection of HCV areas, forest conversion, hazardous pesticide use, respect for Indigenous Peoples' rights, controls over certification bodies, international consistency or implementation.

Aspect/ Indicator	Requirements	Comment	
Governance and decision making			
Majority non business representatives in key decision making	**PEFC ST 1001:2017 — Standard Setting – Requirements** 6.2.1 The standardizing body shall identify stakeholders relevant to the objectives and scope of the standard-setting activities by means of **a stakeholder identification mapping** exercise […] 6.2.2 Identification of stakeholder groups shall be based on **nine major stakeholder groups as defined by Agenda 21** of the United Nations Conference on Environment and Development (UNCED) in Rio de Janeiro in 1992. At least the following groups shall be included in the stakeholder mapping: • forest owners, • business and industry, • indigenous people, • non-government organizations, • scientific and technological community, • workers and trade unions. Other groups shall be added if relevant to the scope of standard-setting activities. Note: The full list of nine major stakeholder groups defined by Agenda 21 of the United Nations Conference on Environment and Development consists of: (i) business and industry, (ii) children and youth, (iii) forest owners, (iv) indigenous peoples, (v) local authorities, (vi) non-government organizations, (vii) scientific and technological community, (viii) women, and (ix) workers and trade unions. 6.4.1 The standardizing body shall establish a permanent or temporary working group or adjust the composition of an already existing working group based on nominations it received. Acceptance and refusal of nominations shall be justified in relation to the requirements for **balanced representation of the working group,** considerations of an appropriate gender	PEFC requires for standard setting working groups to have balanced representation and decision making, where no single can dominate, nor be dominated, in the process. Standard setting working groups are based on the nine major stakeholder groups identified in Agenda 21. “Business and industry” is one of the nine groups. The decision of the working group to recommend the final draft for formal approval shall be taken on the basis of consensus. When there is evidence of	Yes

	balance, relevance of the organization, an individual's competence, an individual's relevant experience and resources available for standard-setting. 6.4.2 The working group shall: a) have **balanced representation and decision-makin**g by stakeholder categories, relevant to the subject matter and geographical scope of the standard, where **no single concerned stakeholder group can dominate, nor be dominated in the process**, and b) include stakeholders with expertise relevant to the subject matter of the standard, those that affected by the standard, and those that can influence implementation of the standard. The affected stakeholders shall be represented in an appropriate proportion among participants. 6.4.5 The decision of the working group to recommend the final draft for formal approval shall be taken on the **basis of consensus**. […] 7.1. The standardizing body shall approve the standard(s)/normative document(s) formally when there is **evidence of consensus** among the working group.	consensus, the standardising body must approve the standard. Given that "business and industry" is only one of the Agenda 21 major stakeholder groups in the standard setting working group, that balanced representation is required, and that standards that recommended for approval by consensus must be approved by the standardising body, the indicator is met.	
Member of ISEAL?		PEFC is a subscriber member	Yes
Strength of Standards			
No other natural ecosystem conversion including peatland?	**PEFC ST 1003:2018 — Sustainable Forest Management – Requirements** 8.4.1 The standard requires that management planning shall aim **to maintain, conserve or enhance biodiversity on landscape**, ecosystem, species and genetic **levels**.	PEFC has strict requirements in place that prohibited the conversion of natural ecosystems. Conversions are not allowed, neither to	Yes

	8.1.5 The standard requires that **afforestation of ecologically important non-forest ecosystems shall not occur unless** in justified circumstances where the conversion: a) is in compliance with national and regional policy and legislation applicable for land use and forest management and is a result of national or regional land-use planning governed by a governmental or other official authority; and b) is established based on a decision-making basis where affected stakeholders have opportunities to contribute to the decision-making on conversion through transparent and participatory consultation processes; and c) does not have negative impacts on threatened (including vulnerable, rare or endangered) non forest ecosystems, culturally and socially significant areas, important habitats of threatened species or other protected areas; and d) entails a small proportion of the ecologically important non-forest ecosystem managed by an organisation; and e) does not destroy areas of significantly high carbon stock; and f) makes a contribution to long-term conservation, economic, and social benefits. **PEFC ST 1003:2018 — Sustainable Forest Management – Requirements** Appendix 1: Guidelines for the interpretation of requirements in the case of forest plantations 8.1.5. The requirement for the "reforestation and afforestation of ecologically important non forest ecosystems" means that **ecologically important non-forest ecosystems reforested or afforested** after **31 December 2010** in other than "justified circumstances" do not meet the requirement and are not eligible for certification. Appendix 2: Guidelines for the interpretation of requirements for Trees outside Forests (TOF) 8.1.5 The standard requires that **conversion of ecologically important non-forest ecosystems to TOF areas** shall not occur unless in justified circumstances (...) TOF areas established by a conversion after **31 December 2010** in other than "justified circumstances" do not meet the requirement and are not eligible for certification	forests, nor to plantations, nor to Trees outside Forests (TOF). The cut off date of 31 December 2010 is sufficiently strong.	
Is the cut off date for forest and natural	**PEFC ST 1003:2018 — Sustainable Forest Management – Requirements**	The cut off date of 31 December 2010 is sufficiently strong.	Yes

<table>
<tr><td>ecosystem conversion strong?</td><td colspan="2">Appendix 1: Guidelines for the interpretation of requirements in the case of forest plantations 8.1.4. The requirement that “forest conversion shall not occur” means that forest plantations established by a forest conversion after 31 December 2010 in other than “justified circumstances” do not meet the requirement and are not eligible for certification.</td><td></td><td></td></tr>
<tr><td>HCV protection and conservation areas?</td><td colspan="2"><table>
<tr><th colspan="2">PEFC and HCV requirements safeguarding natural habitats</th></tr>
<tr><th>PEFC ST 1003:2018 (selected requirements)</th><th>High Conversation Value</th></tr>
<tr><td>(3.5.) Forest areas

a) Containing protected, rare, sensitive or representative forest ecosystems;
b) Containing significant concentrations of endemic species and habitats of threatened species, as defined in recognised reference lists;
c) Containing endangered or protected genetic in situ resources;
d) Contributing to globally, regionally and nationally significant large landscapes with natural distribution and abundance of naturally occurring species.

(8.4.1) The standard requires that management planning shall aim to maintain, conserve or enhance biodiversity on landscape, ecosystem, species and genetic levels.</td><td>HCV 1 Species diversity
Concentrations of biological diversity including endemic species, and rare, threatened or endangered species, that are significant at global, regional or national levels.

HCV 2 Landscape-level ecosystems and mosaics
Large landscape-level ecosystems and ecosystem mosaics that are significant at global, regional or national levels, and that contain viable populations of the great majority of the naturally occurring species in natural patterns of distribution and abundance.

HCV 3 Ecosystems and habitats
Rare, threatened, or endangered ecosystems, habitats or refugia.</td></tr>
<tr><td>(8.5.1) The standard requires that protective functions of forests for society, such as their potential role in erosion control, flood prevention, water purification, climate regulation, carbon sequestration and other regulating or supporting ecosystem services shall be maintained or enhanced.</td><td>HCV 4 Ecosystem services: Basic ecosystem services in critical situations, including protection of water catchments and control of erosion of vulnerable soils and slopes.</td></tr>
</table></td><td>PEFC has elaborated a range of requirements and criteria in its Sustainability Benchmarks to preserve critical ecosystems.

While PEFC does not utilize the term “high conservation values”, its requirements appropriately address the six HCV categories.</td><td>Yes</td></tr>
</table>

	(8.6.1) The standard requires that forest management planning shall aim to respect all socio-economic functions of forests. **(8.6.3)** The standard requires that sites with recognised specific historical, cultural or spiritual significance and areas fundamental to meeting the needs of indigenous peoples and local communities (e.g. health, subsistence) shall be protected or managed in a way that takes due regard of the significance of the site**.** **(8.6.4)** The standard requires that management shall promote the long-term health and well-being of communities within or adjacent to the forest management area, where appropriate supported by engagement with local communities and indigenous peoples.	**HCV 5** Community needs: Sites and resources fundamental for satisfying the basic necessities of local communities or indigenous peoples (for livelihoods, health, nutrition, water, etc...), identified through engagement with these communities or indigenous peoples. **HCV 6** Cultural values: Sites, resources, habitats and landscapes of global or national cultural, archaeological or historical significance, and/or of critical cultural, ecological, economic or religious/sacred importance for the traditional cultures of local communities or indigenous peoples, identified through engagement with these local communities or indigenous peoples.		
Does it require the principles for ecological agriculture/forestry ?	**PEFC ST 1003:2018 — Sustainable Forest Management – Requirements** 3.23 Trees outside Forests (TOF) Trees growing outside areas of nationally designated forest land. Such areas will normally be classified as “agriculture” or “settlement”. Appendix 2: Guidelines for the interpretation of requirements for Trees outside Forests (TOF) A. Introduction This Appendix provides interpretation for developing regional, national and sub-national requirements and standards applicable for Trees outside Forests (TOF). As stated in PEFC ST 1003:2018, all requirements referring to ‘forest’ are also applicable to ‘TOF’ unless otherwise indicated in this Appendix.		PEFC has undertaken an important step towards the ecological forestry and farming with the inclusion of specific requirements for the sustainable management of Trees outside Forests (TOF). Combined with PEFC’s focus on	Yes

	There exists a rich global diversity of TOF systems. Some are natural or semi-natural ecosystems with ecological complexity and ecosystem services equivalent to natural forests. At the other end of the spectrum are individual trees in fields or linear tree formations. In cases where the PEFC ST 1003:2018 requirements deserve specific interpretation to improve or establish relevancy for TOF, interpretations are provided in Section B. Specific PEFC ST 1003:2018 requirements which may not be applicable to certain TOF systems are outlined in Section D. To identify such exceptions, PEFC defines four categories to objectively distinguish between different TOF systems. The categories are based on land classification and management intensity: TOF-agriculture (intensive and extensive) and TOF-settlement (intensive and extensive). It is within TOF agriculture extensive and TOF-settlement extensive that select PEFC ST 1003:2018 requirements may not be applicable. During the national standard setting process, the typical TOF systems of national relevance will be identified and the appropriate threshold between intensive and extensive discussed and agreed. Criteria to support this discussion are proposed in Section E. With this threshold articulated, it should be clear to which category particular TOF systems belong and if any flexibility exists when applying the PEFC ST 1003:2018 requirements into regional, national and sub-national standard(s). B. Interpretation of Requirements for Trees outside Forests 4.3.2 The standard requires that TOF management shall comprise the cycle of inventory and planning, implementation, monitoring and evaluation and shall include an appropriate assessment of the social, environmental and economic impacts of TOF management practices. This shall form a basis for a cycle of continuous improvement. 6.2.5 The standard requires that management plans specify ways and means to minimise the risk of degradation of and damages to natural ecosystems	● smallholders and local communities ● efficient mechanisms for group certification ● development of standards at national level ● multi-stakeholder, consensus driven standard development processes ● local ownership of certification schemes ● requirement for good agricultural practices, PEFC makes an important contribution to ecologically sound, socially just, and economically viable farming and forestry.	

	6.3.1.1 The standard requires that the organisation shall identify and have access to the legislation applicable to its TOF management and determine how these compliance obligations apply to the organisation. 6.3.1.2 The standard requires that the organisation shall comply with applicable local, national or international legislation applicable to TOF area including but not limited to: agriculture and agroforestry; nature and environmental protection; protected and endangered species; property, tenure and land-use rights for indigenous peoples, local communities or other affected stakeholders; health, labour and safety issues; crop damage compensation; anti-corruption and the payment of royalties and taxes. 7.2.1 The standard requires that land managers, contractors, employees and land owners shall be provided with sufficient information and required to keep up-to-date through continuous training in relation to agroforestry, good agriculture practices and forestry techniques as a precondition for all management planning and practices described in this benchmark. 8.1.1 The standard requires that management shall aim to maintain or increase the cover, value and/or diversity of trees in the landscape and their related ecosystem services in ways that enhance the economic, ecological, cultural and social values and are aligned with existing landuse regimes. 8.1.2 The standard requires that management shall maintain or enhance TOF resources and their capacity to capture and store carbon in the medium and long term by balancing harvesting and growth rates, and by minimising direct or indirect damage to ecosystem resources. 8.1.4 The standard requires that conversion to TOF shall not occur unless in justified circumstances (...) TOF areas established by a forest conversion after 31 December 2010 in other than “justified circumstances” do not meet the requirement and are not eligible for certification. 8.1.5 The standard requires that conversion of ecologically important non-forest ecosystems to TOF areas shall not occur unless in justified circumstances (...) TOF areas established by a conversion after 31 December 2010 in other than “justified circumstances” do not meet the requirement and are not eligible for certification. 8.2.1 The standard requires that health and vitality of TOF areas shall be maintained or enhanced and degraded lands shall be rehabilitated whenever this is feasible, by making best use of landscape features, natural processes and using preventive biological measures. 8.2.2 The standard requires that adequate genetic, species and structural diversity shall be encouraged or maintained to enhance the stability, vitality and resilience of the TOF area.		

	8.2.4 The standard requires that appropriate TOF management practices shall use tree, crop and animal species and provenances that are suited to the site conditions and the use of tending, harvesting and transport techniques that minimise tree and/or soil damage shall be applied. 8.3.1 The standard requires that the capability of the TOF area to provide wood products, nonwood forest products and/or services from trees on a sustainable basis shall be maintained. 8.4.1 The standard requires that management planning shall aim to maintain, conserve or enhance biodiversity on landscape, ecosystem, species and genetic levels. 8.4.12 The standard requires that, with due regard to management objectives, measures shall be taken to balance the effect of domesticated and wild animals on the regeneration and growth of trees, as well as on biodiversity and the control of fire. 8.5.1 The standard requires that the protective functions of trees within the agriculture and settlement landscape shall be maintained or enhanced. 8.6.5 The standard requires that traditional knowledge and recognized best practice for agroforestry & TOF management be utilized. Equitable sharing of the benefits arising from the utilization of such knowledge, innovations and practices shall be encouraged. Partial C. Additional requirement for Trees outside Forests The standard requires that management of the agricultural components within a TOF system shall follow good agricultural practice and available guidelines.		
Intact forest landscape (IFL) protection	**PEFC ST 1003:2018 — Sustainable Forest Management – Requirements** 3.5 Ecologically important forest areas Forest areas a) Containing protected, rare, sensitive or representative forest ecosystems; b) Containing significant concentrations of endemic species and habitats of threatened species, as defined in recognised reference lists; c) Containing endangered or protected genetic in situ resources; d) Contributing to globally, regionally and nationally significant large landscapes with natural distribution and abundance of naturally occurring species. 8.4.1 The standard requires that management planning shall aim to maintain, conserve or enhance biodiversity on landscape, ecosystem, species and genetic levels.	PEFC covers the general idea of IFL, which is not a widely internationally recognised concept. The involvement of Greenpeace in national standard setting working groups would contribute toward potential recognition of IFL areas as part of	Yes

	8.4.2 The standard requires that inventory, mapping and planning of forest resources shall identify, protect, conserve or set aside ecologically important forest areas. 8.4.8 The standard requires that a diversity of both horizontal and vertical structures and the diversity of species such as mixed stands shall be promoted, where appropriate. The practices shall also aim to maintain or restore landscape diversity.	ecologically important forest areas at national level, also contributing to a wider recognition of the IFL concept.	
Requires respect for indigenous and land rights?	**PEFC ST 1003:2018 — Sustainable Forest Management – Requirements** 6.3.1.2 The standard requires that the organisation shall comply with applicable local, national and international legislation on forest management, including but not limited to forest management practices; nature and environmental protection; protected and endangered species**; property, tenure and land-use rights for indigenous peoples**, local communities or other affected stakeholders; health, labour and safety issues; anti-corruption and the payment of applicable royalties and taxes. 6.3.2.2 The standard requires that forest practices and operations shall be conducted in recognition of the established framework of **legal, customary and traditional rights such as outlined in ILO 169 and the UN Declaration on the Rights of Indigenous Peoples**, which shall not be infringed upon without the **free, prior and informed consent** of the holders of the rights, including the provision of compensation where applicable. [...] 8.6.3 The standard requires that sites with recognised specific **historical, cultural or spiritual significance and areas fundamental to meeting the needs of indigenous peoples** and local communities (e.g. health, subsistence) shall be protected or managed in a way that takes due regard of the significance of the site.	PEFC has extensive and robust requirements in place requiring respect for indigenous and land rights	Yes
Requirements on associated companies applied at group level?	**PEFC ST 1003:2018 — Sustainable Forest Management – Requirements** 5.1 The standard requires that the organisation shall provide a **commitment**: a) to **comply with the sustainable forest management standard** and other applicable requirements of the certification system; b) to **continuously improve** the sustainable forest management system. 5.2 The standard requires that this **commitment shall be publicly** available.	The requirement for a public commitment by the company to comply with SFM requirements and to continuously improve its SFM system is important in	Yes

		influencing associated companies at group level.	
Transparency & traceability			
Maps and ownership of sourcing areas made publicly available?	**PEFC ST 1003:2018 — Sustainable Forest Management – Requirements** 6.2.7 The standard requires that a summary of the **management plan**, appropriate to the scope and scale of forest management, **shall be publicly available** and shall include information on the general objectives and forest management principles.	PEFC requires the public availability of the management plan, which contains maps.	Yes
Summary reports or results of Audit assessments made public?	**PEFC Technical Document – Annex 6** A **summary of the certification report**, including a **summary of findings** on the auditees conformity with the forest management standard, written by the certification body, shall be **made available to the public** by the auditee or in accordance with any applicable requirements defined by the respective forest certification scheme.	PEFC requires for summary reports or results of Audit assessments made public	Yes
Audits			
Is there a requirement for a rotation of auditors and/or CBs? *Footnote: To mitigate lack in independence, objective and conflict of interest of the same auditor or CB over time*	**ISO/IEC 17021** 4.1.2 The overall aim of certification is to give confidence to all parties that a management system fulfils specified requirements. The value of certification is the degree of public confidence and trust that is established by an impartial and competent assessment by a third-party. Parties that have an interest in certification include, but are not limited to a) the clients of the certification bodies; b) the customers of the organizations whose management systems are certified; c) governmental authorities; d) non-governmental organizations; e) consumers and other members of the public. 4.1.3 Principles for inspiring confidence include: ● impartiality; ● competence;	ISO 17021 and ISO 19011 contain an extensive set of requirements to ensure independence, impartiality, objectivity and the absence of conflict of interest of both the certification body as well as the auditors. PEFC requires compliance with both	Yes

	● responsibility; ● openness; ● confidentiality; ● responsiveness to complaints; ● risk-based approach. 4.2 Impartiality 4.2.1 Being impartial, and being perceived to be impartial, is necessary for a certification body to deliver certification that provides confidence. It is important that all internal and external personnel are aware of the need for impartiality. 4.2.2 It is recognized that the source of revenue for a certification body is its client paying for certification, and that this is a potential threat to impartiality. 4.2.3 To obtain and maintain confidence, it is essential that a certification body's decisions be based on objective evidence of conformity (or nonconformity) obtained by the certification body, and that its decisions are not influenced by other interests or by other parties. 4.2.4 Threats to impartiality may include but are not limited to the following. a) Self-interest: threats that arise from a person or body acting in their own interest. A concern related to certification, as a threat to impartiality, is financial self-interest. b) Self-review: threats that arise from a person or body reviewing the work done by themselves. c) Auditing the management systems of a client to whom the certification body provided management systems consultancy would be a self-review threat. d) Familiarity (or trust): threats that arise from a person or body being too familiar with or trusting of another person instead of seeking audit evidence. e) Intimidation: threats that arise from a person or body having a perception of being coerced openly or secretively, such as a threat to be replaced or reported to a supervisor. 4.3 Competence	ISO 17021 and ISO 19011	

	4.3.1 Competence of the personnel of the certification body in all functions involved in certification activities is necessary to deliver certification that provides confidence. 4.3.2 The competence also needs to be supported by the management system of the certification body. 4.3.3 It is a key issue for the management of the certification body to have an implemented process for the establishment of competence criteria for the personnel involved in the audit and other certification activities and to perform evaluation against the criteria. 5.2 Management of impartiality 5.2.1 Conformity assessment activities shall be undertaken impartially. The certification body shall be responsible for the impartiality of its conformity assessment activities and shall not allow commercial, financial or other pressures to compromise impartiality. 5.2.2 The certification body shall have top management commitment to impartiality in management system certification activities. The certification body shall have a policy that it understands the importance of impartiality in carrying out its management system certification activities, manages conflict of interest and ensures the objectivity of its management system certification activities. 5.2.3 The certification body shall have a process to identify, analyse, evaluate, treat, monitor, and document the risks related to conflict of interests arising from provision of certification including any conflicts arising from its relationships on an ongoing basis. Where there are any threats to impartiality, the certification body shall document and demonstrate how it eliminates or minimizes such threats and document any residual risk. The demonstration shall cover all potential threats that are identified, whether they arise from within the certification body or from the activities of other persons, bodies or organizations. When a relationship poses an unacceptable threat to impartiality (such as a wholly owned subsidiary of the certification body requesting certification from its parent), then certification shall not be provided. Top management shall review any residual risk to determine if it is within the level of acceptable risk.		

	The risk assessment process shall include identification of and consultation with appropriate interested parties to advise on matters affecting impartiality including openness and public perception. The consultation with appropriate interested parties shall be balanced with no single interest predominating. 5.2.5 The certification body and any part of the same legal entity and any entity under the organizational control of the certification body [see 9.5.1.2, bullet b)] shall not offer or provide management system consultancy. This also applies to that part of government identified as the certification body 5.2.6 The carrying out of internal audits by the certification body and any part of the same legal entity to its certified clients is a significant threat to impartiality. Therefore, the certification body and any part of the same legal entity and any entity under the organizational control of the certification body [see 9.5.1.2, bullet b)] shall not offer or provide internal audits to its certified clients. A recognized mitigation of this threat is that the certification body shall not certify a management system on which it provided internal audits for a minimum of two years following the completion of the internal audits. 5.2.8 The certification body shall not outsource audits to a management system consultancy organization, as this poses an unacceptable threat to the impartiality of the certification body (see 7.5). This does not apply to individuals contracted as auditors covered in 7.3. 5.2.9 The certification body's activities shall not be marketed or offered as linked with the activities of an organization that provides management system consultancy. The certification body shall take action to correct inappropriate links or statements by any consultancy organization stating or implying that certification would be simpler, easier, faster or less expensive if the certification body were used. A certification body shall not state or imply that certification would be simpler, easier, faster or less expensive if a specified consultancy organization were used. 5.2.10 In order to ensure that there is no conflict of interests, personnel who have provided management system consultancy, including those acting in a managerial capacity, shall not be		

	used by the certification body to take part in an audit or other certification activities if they have been involved in management system consultancy towards the client. A recognized mitigation of this threat is that personnel shall not be used for a minimum of two years following the end of the consultancy. 5.2.11 The certification body shall take action to respond to any threats to its impartiality arising from the actions of other persons, bodies or organizations. 5.2.12 All certification body personnel, either internal or external, or committees, who could influence the certification activities, shall act impartially and shall not allow commercial, financial or other pressures to compromise impartiality. 5.2.13 Certification bodies shall require personnel, internal and external, to reveal any situation known to them that can present them or the certification body with a conflict of interests. Certification bodies shall record and use this information as input to identifying threats to impartiality raised by the activities of such personnel or by the organizations that employ them, and shall not use such personnel, internal or external, unless they can demonstrate that there is no conflict of interest. **ISO 19011** 4 Principles of auditing Auditing is characterized by reliance on a number of principles. These principles should help to make the audit an effective and reliable tool in support of management policies and controls, by providing information on which an organization can act in order to improve its performance. Adherence to these principles is a prerequisite for providing audit conclusions that are relevant and sufficient and for enabling auditors, working independently from one another, to reach similar conclusions in similar circumstances. The guidance given in Clauses 5 to 7 is based on the six principles outlined below. a) Integrity: the foundation of professionalism Auditors and the person managing an audit programme should: 1. perform their work with honesty, diligence, and responsibility; 2. observe and comply with any applicable legal requirements;		

3. demonstrate their competence while performing their work;
4. perform their work in an impartial manner, i.e. remain fair and unbiased in all their dealings;
5. be sensitive to any influences that may be exerted on their judgement while carrying out an audit.

b) Fair presentation: the obligation to report truthfully and accurately
Audit findings, audit conclusions and audit reports should reflect truthfully and accurately the audit activities. Significant obstacles encountered during the audit and unresolved diverging opinions between the audit team and the auditee should be reported. The communication should be truthful, accurate,objective, timely, clear and complete.

c) Due professional care: the application of diligence and judgement in auditing
Auditors should exercise due care in accordance with the importance of the task they perform and the confidence placed in them by the audit client and other interested parties. An important factor in carrying out their work with due professional care is having the ability to make reasoned judgements in all audit situations.

d) Confidentiality: security of information
Auditors should exercise discretion in the use and protection of information acquired in the course of their duties. Audit information should not be used inappropriately for personal gain by the auditor or the audit client, or in a manner detrimental to the legitimate interests of the auditee. This concept includes the proper handling of sensitive or confidential information.

e) Independence: the basis for the impartiality of the audit and objectivity of the audit conclusions Auditors should be independent of the activity being audited wherever practicable, and should in all cases act in a manner that is free from bias and conflict of interest. For internal audits, auditors should be independent from the operating managers of the function being audited. Auditors should maintain objectivity throughout the audit process to ensure that the audit findings and conclusions are based only on the audit evidence.

For small organizations, it may not be possible for internal auditors to be fully

	independent of the activity being audited, but every effort should be made to remove bias and encourage objectivity. f) Evidence-based approach: the rational method for reaching reliable and reproducible audit conclusions in a systematic audit process Audit evidence should be verifiable. It will in general be based on samples of the information available, since an audit is conducted during a finite period of time and with finite resources. An appropriate use of sampling should be applied, since this is closely related to the confidence that can be placed in the audit conclusions		
Implementation			
Complaints and grievances mechanisms and cases made public	Complaints and grievance mechanisms are publicly available on the PEFC website and in the technical documentation, the PEFC Council procedures for the investigation and resolution of complaints and appeals (GL 7/2007) . All cases filed by PEFC International are publicly available.	PEFC's complaints and grievance mechanism is publicly available, as are all complaints filed by PEFC International.	Partial
No major breaches of standards including deforestation, human rights abuses (labour, land rights), HCVs destroyed, and in 'mix' materials	**PEFC ST 2003:2020** 7.6 Certification decision All the requirements given in clause 7.6 of ISO/IEC 17065:2012(E) apply. 7.6.1 Audit findings shall be classified as major nonconformities, minor nonconformities and observations. 7.6.2 Before granting initial certification, as a minimum, major and minor nonconformities shall be corrected and the corrective action(s) verified by the certification body. 7.6.3 Before granting recertification, as a minimum, major nonconformities shall be corrected and the corrective action(s) verified by the certification body. **PEFC ST 2002:2020** 3.7 Controversial sources Forest and tree based material sourced from: a) Activities not complying with applicable local, national or international legislation on forest	PEFC does not allow for companies to obtain certification if there are major breaches of certification requirements, including breaches to requirements concerning Controversial Sources. Non-conformities need to be resolved.	Yes

	b) management, including but not limited to forest management practices; nature and environmental protection; protected and endangered species; property, tenure and land-use rights for indigenous peoples, local communities or other affected stakeholders; health, labour and safety issues; anticorruption and the payment of applicable royalties and taxes. c) Activities where the capability of forests to produce a range of wood and non-wood forest products and services on a sustainable basis is not maintained or harvesting levels exceed a rate that can be sustained in the long term. d) Activities where forest management does not contribute to the maintenance, conservation or e) enhancement of biodiversity on landscape, ecosystem, species or genetic levels. f) Activities where ecologically important forest areas are not identified, protected, conserved or set aside. g) Activities where forest conversions occur, in other than justified circumstances where h) the conversion: i. is in compliance with national and regional policy and legislation applicable for land use i) and forest management, and j) ii. does not have negative impacts on ecologically important forest areas, culturally and k) socially significant areas, or other protected areas, and l) iii. does not destroy areas of significantly high carbon stock, and m) iv. makes a contribution to long-term conservation, economic, and/or social benefits. n) Activities where the spirit of the ILO Declaration on Fundamental Principles and Rights at Work o) (1998) is not met. p) Activities where the spirit of the United Nations Declaration on the Rights of Indigenous Peoples q) (2007) is not met. r) Conflict timber. s) i) Genetically modified trees.		

Strong consequences - in proportion to the breach - for companies or CBs violating scheme standards?	**PEFC GD 1005** **Appendix 1 -** PEFC trademarks usage contract – user group A: PEFC National Governing Bodies or PEFC authorised bodies Article 6: Contract Termination 2. The PEFC Council may revoke the contract temporarily with immediate effect while a suspicion of contravention of the contract or the PEFC ST 2001, Trademarks Rules - Requirements is being investigated. 3. In case of detection of misuse or suspicion of misuse of the PEFC trademarks, the PEFC Council shall send the trademarks user a written request for an explanation and a notification of the temporary revocation of the contract by email to the latest email address in possession of the PEFC Council. The trademarks user has two (2) weeks from the date the email was sent to confirm receipt and provide explanation to the PEFC Council. The temporary revocation shall remain in effect for a maximum period of one (1) month after the trademarks user has provided an explanation concerning the suspected misuse to the PEFC Council, which will examine the matter. If the misuse is confirmed, the temporary revocation will be expanded for another period of three (3) months. During these three (3) months, the trademarks user shall implement corrective measures to resolve the misuse. After these three (3) months, the PEFC Council will examine the corrective measures implemented and the result and may either reverse a decision on the temporary revocation of the contract, or may decide to terminate definitively the trademarks usage contract. In both cases, the PEFC Council shall notify the trademarks user of its decision in writing. 4. As part of the investigation of suspicion, the PEFC Council reserves the right to carry out (by itself or to commission a third party to act on its behalf) an on-site inspection of the trademarks user's operations, if it has received a complaint by a third party or if the PEFC Council has reasons to believe that the contract is being contravened. The trademarks user shall bear responsibility for the costs of said inspection and any other detrimental effects. 5. The PEFC Council may terminate the contract with immediate	There are strict consequences in place in case companies or CBs violate requirements, as well as for national members of PEFC.	Yes

effect if there are reasons to believe that any of the terms of the contract or PEFC ST 2001, Trademarks Rules - Requirements are not being adhered to.

Appendix 2: PEFC trademarks usage contract - user group B: Sustainable forest management (SFM) certified entities

Article 6: Penalty

1. The PEFC Council may impose a contractual penalty of a Swiss France (CHF) amount being one-fifth the market value of the products to which the unauthorised trademarks use relates, unless the trademarks user(s) proves that such unauthorised use was unintentional. In the latter case the penalty will be limited to 15,000 CHF.
2. The PEFC Council has the right to alter the amount of penalty demanded for use of the PEFC trademarks in contravention of the contract. The change shall come into effect in the contract between the PEFC Council and the trademarks user ninety (90) days after the former has informed the latter, in writing, of the change.

Article 7: Contract Termination

2. The PEFC Council may revoke the contract temporarily with immediate effect while a suspicion of contravention of the contract or PEFC ST 2001, Trademarks Rules - Requirements is being investigated.
3. In case of detection of misuse or suspicion of misuse of the PEFC trademarks, the PEFC Council shall send the trademarks user(s) a written request for an explanation and a notification of the temporary revocation of the contract by email to the latest email address in possession of the PEFC Council. The trademarks user(s) has (have) two (2) weeks from the date the email was sent to confirm receipt and provide explanation to the PEFC Council. The temporary revocation shall remain in effect for a maximum period of one (1) month after the trademarks user(s) has (have) provided an explanation concerning the suspected misuse to the PEFC Council, which will examine the matter. If the misuse is confirmed, the temporary revocation will be expanded for another period of three (3) months. During these three (3) months, the trademarks user(s) shall

	implement corrective measures to resolve the misuse. After these three (3) months, the PEFC Council will examine the corrective measures implemented and the result and may either reverse a decision on the temporary revocation of the contract, or may decide to terminate definitively the trademarks usage contract. In both cases, the PEFC Council shall notify the trademarks user(s) of its decision in writing. 4. As part of the investigation of suspicion, the PEFC Council reserves the right to carry out (by itself or to commission a third party to act on its behalf) an on-site inspection of the trademarks user(s)'s operations, if it has received a complaint by a third party or if the PEFC Council has reasons to believe that the contract is being contravened. The trademarks user(s) shall bear responsibility for the costs of said inspection and any other detrimental effects. 5. The PEFC Council may revoke the contract temporarily with immediate effect where there is a suspicion of misuse of the sustainable forest management certification by the trademarks user(s) investigated by the certification body. The suspension will last until the certification body has finished its investigation. If the certification body decides to keep the trademarks user(s) certified, the trademarks usage contract will be reinstated. On the contrary, this trademarks usage contract will be terminated on the same date as the certificate. 6. The PEFC Council may terminate the contract with immediate effect if there are reasons to believe that any of the terms of the contract or PEFC ST 2001, Trademarks Rules – Requirements in its valid version are not being adhered to; or the trademarks user(s) may be bringing PEFC to disrepute. 7. Withdrawal or termination of the validity of the PEFC recognised forest management certificate will result in automatic withdrawal or termination of the PEFC trademarks usage contract with effect on the same date as the withdrawal or termination of the validity of the forest management certificate. 8. Suspension of the PEFC recognised forest management certificate will result in automatic suspension of the PEFC trademarks usage contract with effect on the same date as the suspension of the validity of the forest management certificate, until the suspension is lifted. If the suspension is lifted and the recognised forest management certificate is valid again, this contract will be valid again on the same date as the		

certificate. If the suspension turns into a termination or withdrawal of the certificate, this contract will be automatically terminated from the same date of termination or withdrawal of the certificate.

Appendix 3: PEFC trademarks usage contract - user group C: Chain of custody certified entities – individual

Article 6: Penalty

1. The PEFC Council may impose a contractual penalty of a Swiss Franc (CHF) amount being one-fifth the market value of the products to which the unauthorised trademarks use relates, unless the trademarks user proves that such unauthorised use was unintentional. In the latter case the penalty will be limited to 15,000 CHF.
2. The PEFC Council has the right to alter the amount of penalty demanded for use of the PEFC trademarks in contravention of the contract. The change shall come into effect in the contract between the PEFC Council and the trademarks user ninety (90) days after the former has informed the latter, in writing, of the change.

Article 7: Contract Termination

2. The PEFC Council may revoke the contract temporarily with immediate effect while a suspicion of contravention of the contract or the PEFC ST 2001, Trademarks Rules - Requirements is being investigated.
3. In case of detection of misuse or suspicion of misuse of the PEFC trademarks, the PEFC Council shall send the trademarks user a written request for an explanation and a notification of the temporary revocation of the contract by email to the latest email address in possession of the PEFC Council. The trademarks user has two (2) weeks from the date the email was sent to confirm receipt and provide explanation to the PEFC Council. The temporary revocation shall remain in effect for a maximum period of one (1) month after the trademarks user has provided an explanation concerning the suspected misuse to the PEFC Council, which will examine the matter. If the misuse is confirmed, the temporary revocation will be expanded for another period of three (3)

	months. During these three (3) months, the trademarks user shall implement corrective measures to resolve the misuse. After these three (3) months, the PEFC Council will examine the corrective measures implemented and the result and may either reverse a decision on the temporary revocation of the contract, or may decide to terminate definitively the trademarks usage contract. In both cases, the PEFC Council shall notify the trademarks user of its decision in writing. 4. As part of the investigation of suspicion, the PEFC Council reserves the right to carry out (by itself or to commission a third party to act on its behalf) an on-site inspection of the trademarks user's operations, if it has received a complaint by a third party or if the PEFC Council has reasons to believe that the contract is being contravened. The trademarks user shall bear responsibility for the costs of said inspection and any other detrimental effects. 5. The PEFC Council may revoke the contract temporarily with immediate effect where there is a suspicion of misuse of the chain of custody certification by the trademarks user investigated by the certification body. The suspension will last until the certification body has finished its investigation. If the certification body decides to keep the trademarks user certified, the trademarks usage contract will be reinstated. On the contrary, this trademarks usage contract will be terminated on the same date as the certificate. 6. The PEFC Council may terminate the contract with immediate effect if there are reasons to believe that any of the terms of the contract or the PEFC ST 2001, Trademarks Rules – Requirements in its valid version are not being adhered to; or the trademarks user may be bringing PEFC to disrepute. 7. Withdrawal or termination of the validity of the PEFC recognised chain of custody certificate will result in automatic withdrawal or termination of this PEFC trademarks usage contract with effect on the same date as the termination of the chain of custody certificate. 8. Suspension of the PEFC recognised chain of custody certificate will result in automatic suspension of this contract with effect on the same date as the suspension of the validity of the chain of custody certificate, until the suspension is lifted. If the suspension is lifted and the chain of custody certificate is valid again, this contract will be valid again		

on the same date as the certificate. If the suspension turns into a termination or withdrawal of the certificate, this contract will be automatically terminated from the same date of termination or withdrawal of the certificate

Appendix 4: PEFC trademarks usage contract - user group C: Chain of custody certified entities – multi-site (Appendix 2, 2.3a, PEFC ST 2002:2020)

Article 6: Penalty

1. The PEFC Council may impose, a contractual penalty of a Swiss Franc (CHF) amount being one-fifth the market value of the products to which the unauthorised trademarks use relates, unless trademarks users prove that such unauthorised use was unintentional. In the latter case the penalty will be limited to 15,000 CHF.
2. The PEFC Council has the right to alter the amount of penalty demanded for use of the PEFC trademarks in contravention of the contract. The change shall come into effect in the contract between the PEFC Council and the trademarks users ninety (90) days after the former has informed the latter, in writing, of the change.

Article 7: Contract Termination

2. The PEFC Council may revoke the contract temporarily with immediate effect while a suspicion of contravention of the contract or the PEFC ST 2001, Trademarks Rules - Requirements is being investigated.
3. In case of detection of misuse or suspicion of misuse of the PEFC trademarks, the PEFC Council shall send the trademarks users a written request for an explanation and a notification of the temporary revocation of the contract by email to the latest email address in possession of the PEFC Council. Trademarks users have two (2) weeks from the date the email was sent to confirm receipt and provide explanation to the PEFC Council. The temporary revocation shall remain in effect for a maximum period of one (1) month after the trademarks users have provided an explanation concerning the suspected misuse to the PEFC Council, which will examine the matter. If the misuse is confirmed, the temporary revocation will be expanded for another period of three (3)

	months. During these three (3) months, trademarks users shall implement corrective measures to resolve the misuse. After these three (3) months, the PEFC Council will examine the corrective measures implemented and the result and may either reverse a decision on the temporary revocation of the contract, or may decide to terminate definitively the trademarks usage contract. In both cases, the PEFC Council shall notify the trademarks users of its decision in writing. 4. As part of the investigation of suspicion, the PEFC Council reserves the right to carry out (by itself or to commission a third party to act on its behalf) an on-site inspection of the trademarks users' operations, if it has received a complaint by a third party or if the PEFC Council has reasons to believe that the contract is being contravened. The trademarks users shall bear responsibility for the costs of said inspection and any other detrimental effects. 5. The PEFC Council may revoke the contract temporarily with immediate effect where there is a suspicion of misuse of the chain of custody certification by the trademarks users investigated by the certification body. The suspension will last until the certification body has finished its investigation. If the certification body decides to keep the trademarks users certified, the trademarks usage contract will be reinstated. On the contrary, this trademarks usage contract will be terminated on the same date as the certificate. 6. The PEFC Council may terminate the contract with immediate effect if there are reasons to believe that any of the terms of the contract or the PEFC ST 2001, Trademarks Rules – Requirements in its valid version are not being adhered to; or the trademarks users may be bringing PEFC to disrepute. 7. Withdrawal or termination of the validity of the PEFC recognised chain of custody certificate will result in automatic withdrawal or termination of this PEFC trademarks usage contract with effect on the same date as the termination of the chain of custody certificate. 8. Suspension of the PEFC recognised chain of custody certificate will result in automatic suspension of this contract with effect on the same date as the suspension of the validity of the chain of custody certificate, until the suspension is lifted. If the suspension is lifted and the chain of custody certificate is valid again, this contract will be valid again		

on the same date as the certificate. If the suspension turns into a termination or withdrawal of the certificate, this contract will be automatically terminated from the same date of termination or withdrawal of the certificate.

Appendix 5: PEFC trademarks usage contract – user group D: Other users
Article 6: Penalty

1. The PEFC Council may impose a contractual penalty of a Swiss Franc (CHF) amount being one-fifth the market value of the products to which the unauthorised trademarks use relates, unless the trademarks user(s) proves that such unauthorised use was unintentional. In the latter case the penalty will be limited to 15,000 CHF.
2. The PEFC Council has the right to alter the amount of penalty demanded for use of the PEFC trademarks in contravention of the contract. The change shall come into effect in the contract between the PEFC Council and the trademarks user(s) ninety (90) days after the former has informed the latter, in writing, of the change.

Article 7: Contract Termination

2. The PEFC Council may revoke the contract temporarily with immediate effect while a suspicion of contravention of the contract or the PEFC ST 2001, Trademarks Rules - Requirements is being investigated.
3. In case of detection of misuse or suspicion of misuse of the PEFC trademarks, the PEFC Council shall send the trademarks user(s) a written request for an explanation and a notification of the temporary revocation of the contract by email to the latest email address(es) in possession of the PEFC Council. The trademarks user(s) has (have) two (2) weeks from the date the email was sent to confirm receipt and provide explanation to the PEFC Council. The temporary revocation shall remain in effect for a maximum period of one (1) month after the trademarks user(s) has (have) provided an explanation concerning the suspected misuse to the PEFC Council, which will examine the matter. If the misuse is confirmed, the temporary revocation will be expanded for another period of three (3) months. During these three (3) months, the trademarks user(s) shall implement corrective measures to resolve the misuse. After these three (3) months, the

	PEFC Council will examine the corrective measures implemented and the result and may either reverse a decision on the temporary revocation of the contract, or may decide to terminate definitively the trademarks usage contract. In both cases, the PEFC Council shall notify the trademarks user(s) of its decision in writing. 4. As part of the investigation of suspicion, the PEFC Council reserves the right to carry out (by itself or to commission a third party to act on its behalf) an on-site inspection of the trademarks user(s)'s operations, if it has received a complaint by a third party or if the PEFC Council has reasons to believe that the contract is being contravened. The trademarks user(s) shall bear responsibility for the costs of said inspection and any other detrimental effects. **5.** The PEFC Council may terminate the contract with immediate effect if there are reasons to believe that any of the terms of the contract or the PEFC ST 2001, Trademarks Rules – Requirements, in its valid version, are not being adhered to or the trademarks user(s) may be bringing the PEFC to disrepute. Appendix 6: PEFC trademarks usage contract - user Group D: Retailers and brands owners Article 6: Penalty 1. The PEFC Council shall impose a contractual penalty of a Swiss Franc (CHF) amount being one-fifth the market value of the products to which unauthorised trademarks use relates, unless the trademarks user(s) proves that such unauthorised use was unintentional and that it couldn’t have avoided such unauthorised use by consulting thoroughly all and any normative references, PEFC communication and applicable state regulation. In the latter case the penalty will be limited to 15,000 CHF. 2. The PEFC Council has the right to alter the amount of penalty demanded for use of the PEFC trademarks in contravention of the contract. The change shall come into effect in the contract between the PEFC Council and the trademarks user(s) ninety (90) days after the former has informed the latter, in writing, of the change. Article 7: Contract Termination		

	2. The PEFC Council may revoke the contract temporarily with immediate effect while a suspicion of contravention of the contract or PEFC ST 2001, Trademarks Rules - Requirements is being investigated. 3. In case of detection of misuse or suspicion of misuse of the PEFC trademarks, the PEFC Council shall send the trademarks user(s) a written request for an explanation and a notification of the temporary revocation of the contract by email to the latest email address(es) in possession of the PEFC Council. The trademarks user(s) has (have) two (2) weeks from the date the email was sent to confirm receipt and provide explanation to the PEFC Council. The temporary revocation shall remain in effect for a maximum period of one (1) month after the trademarks user(s) has (have) provided an explanation concerning the suspected misuse to the PEFC Council, which will examine the matter. If the misuse is confirmed, the temporary revocation will be expanded for another period of three (3) months. During these three (3) months, the trademarks user(s) shall implement corrective measures to resolve the misuse. After these three (3) months, the PEFC Council will examine the corrective measures implemented and the result and may either reverse a decision on the temporary revocation of the contract, or may decide to terminate definitively the trademarks usage contract. In both cases, the PEFC Council shall notify the trademarks user(s) of its decision in writing. 4. As part of the investigation of suspicion, the PEFC Council reserves the right to carry out (by itself or to commission a third party to act on its behalf) an on-site inspection of the trademarks user's operations, if it has received a complaint by a third party or if the PEFC Council has reasons to believe that the contract is being contravened. The trademarks user(s) shall bear responsibility for the costs of said inspection and any other detrimental effects. 5. The PEFC Council may terminate the contract with immediate effect if there are reasons to believe that any of the terms of the contract or the PEFC ST 2001, Trademarks Rules – Requirements, in its valid version, are not being adhered to or the trademarks user(s) may be bringing the PEFC into disrepute. Article 6: Contract Termination		

	2. The PEFC Council may revoke the contract temporarily with immediate effect while a suspicion of contravention of the contract or the PEFC Logo Use Rules is being investigated. In case of suspicion, the PEFC Council shall send the logo user a written request for an explanation and notification of the temporary revocation of the contract. The temporary revocation shall remain in effect for a maximum period of one (1) month after the logo user has provided an explanation concerning the suspected misuse to the PEFC Council, which will examine the matter. The PEFC Council may reverse a decision on the temporary revocation of the contract when the logo user has implemented corrective measures approved by the PEFC Council and given the PEFC Council notification that this has been done. 3. The PEFC Council may terminate the contract with immediate effect if there are reasons to believe that any of the terms of the contract or the PEFC Logo Use Rules are not being adhered to. **PEFC GD 1006** Article 4: Contract Termination 2. The PEFC Council may suspend the contract with the immediate effect if there are reasons to believe that any provision of the PEFC notification contract is not being adhered to. **ISO/IEC 17021** 9.6.5.2 The certification body shall **suspend certification** in cases when, for example: ● the client's certified management system has **persistently or seriously failed** to meet certification requirements, including requirements for the effectiveness of the management system; ● the certified client does not allow surveillance or recertification audits to be conducted at the required frequencies; ● the certified client has voluntarily requested a suspension**.**		

	ISO 17011 7.11 Suspending, withdrawing or reducing accreditation 7.11.1 The accreditation body shall have documented procedure(s) and criteria to decide in which circumstances the accreditation shall suspended, withdrawn or reduced when an accredited conformity assessment body has failed to meet the requirements of accreditation or to abide by the rules for accreditation or has voluntarily requested a suspension, withdrawal or reduction. 7.11.2 Where there is evidence of fraudulent behaviour, or the conformity assessment body intentionally provides false information or conceals information, the accreditation body shall initiate its process for withdrawal of accreditation		

ANNEX – Summary comparison of performance of certification schemes

Aspect	Indicator	ISCC	Rainforest Alliance (cattle)	Fairtrade (cocoa and coffee)	Rainforest Alliance & UTZ merged	RSPO	ISPO/ MSPO	RTRS	FEFAC	Proterra	FSC	PEFC
Governance and decision-making	Majority non-business representatives in key decision making	No	No	Yes	No	No	No	No	?	No	Yes	No
	Member of ISEAL? [1]	No	Yes	Yes	Yes	Yes	No	Yes	No	Yes (subscibor)	Yes	No
Strength of Standards	No deforestation or forest conversion to plantations?	yes	Partial[2]	Partial[3]	Yes	Yes	No	Yes	Partial	Yes	Yes	Yes

[1] Covers commitments to best practice for certification systems.
[2] Does not extend to production of feed purchased from third-party suppliers, which is not covered.
[3] Smallholder groups: yes (though rather ambiguously worded). Large producers: no.

	No other natural ecosystem conversion including peatland?	yes	Partial[4]	No	Yes	Partial	No	Yes	Partial	Yes	Partial	Partial
	Is the cut off date for forest and natural ecosystem conversion strong?[5]	yes[6]	Yes[7]	N/A[8]	Yes[9]	No[10]	No[11]	Partial[12]	partial	Yes[13]	Partial[14]	No
	HCV protection and conservation areas?	no	Partial[15]	No?	Partial	Partial	No	Yes	No	Yes	Partial	No
	Does it require the principles for ecological agriculture/forestry?[16]	No	No	No	No	No	No	No	No	No	No	No
	Intact forest landscape (IFL) protection?	No	No?	No?	No?	Yes	No	Partial	No	Yes	Partial	No

[4] Does not extend to production of feed purchased from third-party suppliers, which is not covered.
[5] Minimum cut off date 2015
[6] 2008
[7] Jan 2014 (Nov 2005 HCV)
[8] No cut off date
[9] Jan 2014
[10] Nov 2018
[11] None
[12] 2009 HCV and 2016
[13] 2008
[14] 1994 - good cut off date, but does not apply for ecosystems more broadly
[15] Does not extend to production of feed purchased from third-party suppliers, which is not covered.
[16] Greenpeace principles - https://storage.googleapis.com/planet4-international-stateless/2016/12/b254450f-food-and-farming-vision.pdf

	Requires respect for indigenous and land rights?	Partial	Partial	No	Yes	Yes	No	Yes	Partial	Yes	Yes	Partial
	Addresses labour rights?	No	Partial	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes
	Requirements on associated companies applied at group level?	No	No	No	No	Partial	No	No	No	~~No~~	Partial	No
Transparency & traceability	Maps and ownership of sourcing areas made publicly available[17]?	No	No	No	No	Yes	No	Partial	No	No	Partial	No
	Summary reports or results of Audit assessments made public?	Partial	Yes	No	Yes	Yes	No	Yes	No	~~No~~ Yes (https://www.proterrafoundation.org/wp-content/uploads/2020/10/ProTerra-certification-consolid	Yes	No

[17] Either published by the organization holding the certificate or on the certification scheme website

										ated-results-2019.pdf)		
	Segregated or Identity Protected supply only?	No	Partial	No[18]	No	No	No	No	No	Yes	No	No
Audits[19]	Is there a requirement for a rotation of auditors and/or CBs? [20]	No	No?	No	No?	No	No	No	No	No	Yes	No
	Full independence of audits via 'fire-wall' between CB and company?	No	No?	No	No?	No	No	No	No	No	No	No
Implementation	Complaints and grievances mechanisms and cases made public	no	No	No	No	Yes	No	No	No	Partial	Yes	No
	No major breaches of standards including deforestation, human rights abuses (labour, land rights), HCVs destroyed, and in 'mix' materials	No	No	No	No	No	No	No	?	~~No~~ Yes	No	No

[18] Large producers: yes [except for tea]. Smallholder groups: yes for coffee, no for cocoa [also tea, cane sugar, juice]

[19] The three audit aspects are designed to show the highest standard of audit procedures.

[20] To mitigate lack in independence, objective and conflict of interest of the same auditor or CB over time

	Strong consequences - in proportion to the breach - for companies or CBs violating scheme standards?	No[21]	Partial	Partial	Partial	Partial	No	?	?	Yes	Partial	No
	Compensation implemented (Land rights compensation and or ecosystem restoration?)	No	No	No?	No?	Partial	No	Yes	?	Yes	No	No

[21] Companies that fail to meet 'Major Musts' or at least 60% of 'Minor Musts' will not be certified if the non-conformity is not corrected within 40 days or if a 'Critical Non-Conformity;' such as non-compliance to the EU RED sustainability criteria is detected

Certifying destruction

Certification is not a solution to deforestation, forest degradation and other ecosystem conversion

Introduction

The purpose of this paper is to document the limitations of voluntary private-sector commodity certification schemes – hereafter referred to as 'certification schemes' – in addressing deforestation, ecosystem destruction and human rights abuses and helping to tackle the wider climate and biodiversity emergencies.

The world's forests are a crucial defence against spiralling climate change, and are home to many Indigenous and local communities and innumerable species of animals and plants. The destruction of forests further increases the risk of more diseases like COVID-19 emerging, as humans encroach into previously untouched natural habitats and pathogens transfer from wild animals to humans.[1] The current global health crisis and ecological and climate breakdown share many of the same drivers, including the destruction of forests and other natural ecosystems by industrial agriculture. Some 80% of global deforestation is caused by agricultural expansion,[2] either directly or indirectly, by displacing other crops.

This expansion also contributes to the conversion or degradation of other natural ecosystems such as wetlands (especially peatlands), savannahs, shrublands and grasslands.[3] This continuous destruction causes appalling loss of biodiversity,[4] often violates the rights of Indigenous Peoples and other communities and contributes massively to climate change, jeopardising our chances of limiting the global temperature rise this century to 1.5° Celsius – the goal set in the Paris Agreement[5] and reinforced by the latest Intergovernmental Panel on Climate Change (IPCC) report.[6]

In 2010, members of the Consumer Goods Forum (CGF – a global network of major manufacturers, retailers and other stakeholders) set themselves a deadline of 2020 to eliminate deforestation from their supply chains.[7] The same deadline was also set by several international commitments, such as the Amsterdam Partnership Declaration,[8]

[1] Everard, M., et al. (2020)
[2] Kissinger, G., Herold, M., & De Sy, V. (2012)
[3] See eg Bonanomi, J., et al. (2019).
[4] IPBES (2019)
[5] UNFCCC, The Paris Agreement [Website]
[6] IPCC (2018)
[7] Consumer Goods Forum (2010, 29 November)
[8] Seven European countries have signed the Amsterdam Declaration on Deforestation committing to deforestation-free, sustainable commodities. See Amsterdam Declarations Partnership, About [Website].

Target 15.2 of the United Nations Sustainable Development Goals (UN SDGs),[9] Aichi Biodiversity Target 5[10] and the New York Declaration on Forests (NYDF).[11]

Corporations and some governments have for years been advocating for certification as a means of promoting "deforestation-free" supply chains. Since the introduction of Fairtrade and organic food labelling in the 1980s the number of voluntary certification schemes has increased rapidly,[12] and the schemes have expanded to address a range of aspects of the production process, including deforestation and protection of Indigenous rights. These schemes sell themselves on the basis that if demand for 'responsible' or 'sustainable' – ie, certified – soya, palm oil or timber/wood products can be increased, the result will be a decrease in deforestation and other harms linked to the production of these commodities.[13]

Over the years, much effort – including on Greenpeace International's[14] part, working with the Forest Stewardship Council (FSC)[15] and to some degree the Round Table for Sustainable Palm Oil (RSPO)[16] – has been focused on improving the standards and enforcement of such certification schemes. Despite this work, however, certification has failed to help CGF companies meet their 2020 zero-deforestation commitments.[17]

Companies and governments often still look to certification as a viable solution, arguing that if 100% of the supply of a given commodity is certified, deforestation can be addressed. But the global climate, biodiversity and health crisis we are facing requires governments and companies to choose and implement strong measures. False solutions will only distract and delay, eventually putting us all at even greater risk of making this planet uninhabitable. To inform decision making, this paper therefore outlines the limitations of certification schemes, explains the danger of relying on them as a solution and gives recommendations on the kinds of stronger measures that should be taken.

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[9] 'By 2020, promote the implementation of sustainable management of all types of forests, halt deforestation, restore degraded forests and substantially increase afforestation and reforestation globally.' Source: United Nations Sustainable Development Goals Knowledge Platform, Sustainable Development Goal 15 [Website].

[10] 'By 2020, the rate of loss of all natural habitats, including forests, is at least halved and where feasible brought close to zero, and degradation and fragmentation is significantly reduced.' Source: Convention on Biological Diversity, Aichi Biodiversity Targets [Website].

[11] The NYDF includes targets to end natural forest loss by 2030, with a 50% reduction by 2020. In addition, it calls for restoring 350 million hectares of degraded and deforested lands by 2030, supporting the private sector in eliminating deforestation from the supply chains of major agricultural commodities by 2020, and providing financial support to reduce emissions related to deforestation and forest degradation. See New York Declaration on Forests, About [Website].

[12] Liu, P. (2010), OECD (2016)

[13] See eg International Institute for Environment and Development, Four actions to reduce the 'forest footprint' of commodities [Website].

[14] In this report, mentions of 'Greenpeace' should be read as references to Greenpeace International unless otherwise indicated.

[15] See eg Greenpeace (2008a).

[16] Greenpeace Southeast Asia (2018, 15 November)

[17] See Chain Reaction Research (2020, 5 March), Ecobusiness (2018), Global Canopy (2020), Greenpeace (2018b) and Greenpeace (2019c).

The paper begins by defining some of the key concepts used, such as certification schemes, certification bodies, labelling and verification.

Chapter 1 outlines the main limitations of certification schemes as tools to stop deforestation, forest degradation and other ecosystem conversion by producers of commodities such as beef, biofuels, cocoa, coffee, palm oil, soya and wood products.

Chapter 2 supplements this general discussion by detailing the strengths and weaknesses of some individual certification schemes. Because there are too many schemes for this paper to be able to analyse all of them in detail, only some schemes are discussed, with a focus on those that are most widely used and/or that are claimed by governments and corporations to exemplify best practice.

Finally, based on the paper's findings, the conclusions and recommendations discuss whether certification serves its purpose, consider the appropriate role for certification and suggest what measures governments and companies should focus on instead to clean up supply chains. They also give recommendations on what needs to be done beyond cleaning up supply chains in order to protect the world's biodiversity and ecosystems, to limit global warming to below 1.5° C and to help prevent future pandemics.

Certification – definitions

Certification schemes for forest and ecosystem risk commodities set a range of social and environmental standards with which production of these commodities should comply. These standards usually comprise a set of principles and criteria (with the principles setting out the broad elements of the standard and the criteria defining what is required for each element), together with verifiable indicators of compliance with the criteria. An area, product, manufacturer or processor (eg, mill) is certified by a particular certification scheme when it is assessed as meeting the standards set by that scheme. Whereas certification relates to a particular management area or processing facility, membership is what allows an organisation to participate in governance of the scheme. In some schemes (eg the FSC) a company can be a certificate holder but not a member.[18] For other schemes, like the RSPO, membership is a prerequisite for certification.[19] Participation in almost all certification schemes is voluntary, although in some cases the schemes serve to enable companies to comply with legal requirements – for example, compliance with the European Union's Renewable Energy Directive (EU RED) sustainability criteria is ensured by certification schemes such as the International Sustainability and Carbon Certification (ISCC) and REDCert.[20]

Certification is often used by companies that produce or trade forest risk commodities – or manufacture or sell products containing them – to reassure customers that they or

[18] See FSC, Home [Website] and FSC, Members [Website].
[19] RSPO, RSPO certification [Website]
[20] European Commission, Voluntary schemes [Website]

their suppliers have taken steps to minimise the negative environmental and social impacts linked to the production of the commodities concerned, and that their products can therefore be considered '**sustainable**'.[21] Yet no certification scheme can make a claim that its certified products are truly sustainable, as what is actually sustainable in relation to forests, land and agriculture is not known.

Certification **labelling** is a 'promise' that a product meets the criteria set out by a certification scheme, and is mostly done at the consumer goods manufacturers' end.[22] Typically incorporated into a product's packaging, labelling in theory provides the purchaser/consumer with an indication of the product's sustainability.[23] An important aspect of certification is product or material **traceability**, usually carried out via a **chain of custody (CoC)** system and standards. Traceability is defined as the ability to follow a product or its components through stages of the supply chain (eg, production, processing, manufacturing and distribution); this is required if guarantees are to be made about the certification status of a product.

Companies or consultants serving as **certification bodies** (CBs) undertake the task of ensuring, by means of **audits**, that the certified organisations (producers, processors, downstream companies) comply with the required social and environmental criteria. Each CB has an approved list of auditors – typically consultants or employees of the CB – who can perform the audits. The certified organisations themselves are usually responsible for commissioning these third-party audits, and bear the costs.[24] Most certification schemes require CBs to be accredited by a recognised **accreditation body**, such as Assurance Services International (ASI) for the FSC and RSPO.[25] In simple terms, the role of accreditation bodies such as ASI is to ensure that CBs are following the rules set by the certification schemes. Additional oversight of and guidance on sustainability standards is provided by bodies such as the ISEAL Alliance.[26]

Verification is a simpler approach that does not necessarily form part of a certification scheme; it can be defined as the 'assessment and validation of compliance, performance, and/or actions relative to a stated commitment, standard, or target'.[27] An example would be verification of the extent to which a company is complying with its No Deforestation, No Peat, No Exploitation (NDPE) policy.[28] As part of a certification scheme audit, the process of assessing whether organisations are complying with the required social and environmental criteria may also be referred to as verification.[29]

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[21] For example, Unilever defines 'sustainable sourcing' of palm oil as purchasing only from certified sustainable sources. See Unilever (2020) p.3.
[22] Liu, P. (2010)
[23] Retail Forum for Sustainability (2011)
[24] See eg Carlson, K. M., et al. (2017), Food and Agriculture Organization of the United Nations (2018) and Food and Agriculture Organization of the United Nations, Forest certification [Website].
[25] ASI, Scheme owners we work with [Website]
[26] ISEAL Alliance, Who we are [Website]
[27] Accountability Framework Initiative, Definitions – Monitoring, verification, reporting, and claims [Website]
[28] Accountability Framework Initiative, Core principles – 11. Monitoring and verification [Website], Wilmar International (2018)
[29] FSC (2014) p.3

Chapter 1 - Limitations of certification

INTRODUCTION

The effectiveness and credibility of a certification scheme depend on a range of aspects, including its governance; the independence of its financing, processes and decision making; the strength and scope of its standards; physical traceability in the direct supply chain and the transparency of a producer group's[30] entire production activities (not limited to those directly responsible for the certified product); the required frequency of audits and the quality and independence of the auditing system; the auditing system's level of transparency; the possibility of sanctions; and the rigour with which any sanctions are enforced and implemented.

This chapter considers in general terms five aspects of certification schemes that bear on their effectiveness and credibility – namely governance and decision making, standards, traceability and transparency, auditing and implementation. It begins, however, with some reflections on the inherent flaws of certification schemes as a whole.

INHERENT FLAWS OF CERTIFICATION SCHEMES

Focus on strengthening market position, access, and profits rather than sustainability

The market-based nature of certification means that the primary incentive producers have to meet environmental and social standards is the reward of increased market access or price premiums.[31] The focus is on increasing the demand for or market share of 'sustainable' (ie, certified) products, even when the actual sustainability of those products cannot, as this paper argues, be guaranteed.

Another issue is that the very existence of a sustainability certification scheme for a commodity tends to strengthen that particular commodity's market position, and may discourage efforts to promote the substitution of alternative commodities whose production may be less harmful[32] or to decrease the production and consumption of certain forest risk commodities altogether. The RSPO, for example, goes as far as to

[30] The AFi defines a corporate group as 'The totality of legal entities to which the company is affiliated in a relationship in which either party controls the actions or performance of the other.' See Accountability Framework Initiative, Definitions – Different types of supply chain actors [Website].

[31] See Liu, P. (2010) and Pavel, C., et al. (2016).

[32] Changing Markets Foundation (2018) p.86

forbid its members even to 'make claims which imply that the removal of palm oil from a product is a preferable social or environmental sustainability outcome to the use of RSPO certified sustainable palm oil'.[33]

Misleading label of sustainability with wide variation in the quality of certification schemes

There is little consistency between different certification schemes in terms of their definitions of forests and ecosystems that should be protected, their treatment of historical deforestation and their requirements for remediation or restoration. More broadly, there are large differences in the quality and rigour of the standards and their implementation.[34]

Yet because certification is increasingly being equated with sustainability, despite their differences all of these schemes are able to cultivate a positive image.[35] Claims of certified products being 'sustainable' reflect a fundamental dishonesty on the part of the schemes, when in fact it is not known what truly 'sustainable' practices are and the materials present in products may have contributed, directly or indirectly, to clearly unsustainable practices such as the clearance of natural forests or human rights abuses. But the term 'sustainable' will sound positive to the consumer.

Some of the weaker schemes have taken steps to make themselves appear equivalent to the stronger schemes.[36] In some cases this ultimately has a positive effect, with the less robust schemes eventually becoming more similar to the stronger ones.[37] For example, this has been the case with the weaker Programme for the Endorsement of Forest Certification (PEFC) adopting some FSC policies and standards; indeed, in a few countries its forest management standards are identical to the FSC's, with their assessments being carried out jointly.[38] In other cases, however, the result is misplaced consumer confidence in a certification scheme that does not in fact deliver the expected level of 'sustainability' assurance.

In some instances major commodities traders have set up their own voluntary standards, which can have the effect – intentional or not – of undermining more credible schemes and confusing the market. For example, ADM, Amaggi, Bunge and Cargill have their own standards for soya production, all of which require verification by independent auditors. While these standards claim to supply certified sustainable (or 'responsible') soya, their principles and criteria vary greatly and some are extremely weak.[39]

In the case of national or international guidelines with which different certification schemes are deemed to show compliance, the inconsistencies between schemes mean that the guidelines themselves are only as strong as their weakest link. An example is

[33] RSPO (2017a) p.2
[34] A deeper analysis of various land use–related certification schemes can be found in Voigt, M. (Ed.) (2019).
[35] Changing Markets Foundation (2018)
[36] Changing Markets Foundation (2018)
[37] OECD (2016) pp.11-12
[38] PEFC (2017, 12 June)
[39] Kusumaningtyas, R., & van Gelder, J. W. (2019)

the European Feed Manufacturers' Federation (FEFAC) Soy Sourcing Guidelines,[40] which set a sustainability baseline for importing soya into the European market. Of the 18 schemes – four of which are traders' own schemes – that comply with the guidelines and are classified by FEFAC as sustainable, 10 rely on national legislation that differentiates between legal and illegal deforestation. The problem with a focus on illegal deforestation alone is that it does not address deforestation as such. States often legalise deforestation to accommodate soya producers and allow further expansion.[41] A deeper analysis of FEFAC and other guidelines, including PEFC and RED, can be found in Chapter 2.

Shifting responsibility onto consumers

Certification is used to decrease public concerns about destructive producers and to shift responsibility onto consumers themselves. Instead of governments, producers, traders, manufacturers and retailers being responsible for deciding what does and does not come onto the market, that responsibility is being transferred to consumers who decide what to purchase. This transference is not only unjust but also to a large extent ineffective, as the buying choices of a large proportion of consumers are of necessity driven by price rather than environmental and social justice considerations.[42] The global economic recession caused by the COVID-19 crisis – which is having a disproportionate impact on those with limited purchasing power and choice with regard to consumption – has only exacerbated this situation.[43]

Furthermore, the aforementioned variation in the quality of certification schemes may not be clear to consumers, who are often ill equipped to distinguish between commodities certified by weaker and stronger schemes.[44] Consumers typically distinguish only between products labelled as certified and those that are not. Companies using weaker schemes can thus reap the same market benefits as those using stronger schemes, removing much of the incentive for investing in more robust certification.

GOVERNANCE AND DECISION MAKING

Overrepresentation of business actors in decision making

When the performance standards for certification schemes are being developed and implemented, the market interests of influential corporations tend to carry more weight than the interests of Indigenous and local communities, consumers and other stakeholders, or the need to address the relevant social and/or environmental issues in the most effective way possible.[45] The business sector tends to be disproportionately represented in the membership of certification schemes' governing bodies, giving it a larger role in decision making. This is in part also due to the fact that standards are

[40] FEFAC, Responsible sourcing [Website]
[41] Kusumaningtyas, R., & van Gelder, J. W. (2019)
[42] Lehmann, J., & Sheffi, Y. (2019)
[43] Food and Agriculture Organization of the United Nations, Q&A: COVID-19 pandemic – impact on food and agriculture [Website]
[44] OECD (2016)
[45] Marin-Burgos, V., Clancy, J. S., & Lovett, J. C. (2014)

continuously being adapted into complex sets of principles in order to apply them in very different contexts. It is difficult for civil society to keep up with or match the amount of lobbying done by multinational corporations, which have extensive resources to dedicate to preserving their interests.[46] As a result, corporations frequently have greater influence over certification standards than civil society, whereas people and the environment, not corporations, must be at the heart of governance.

Furthermore, larger and more powerful actors such as agribusiness corporations and global traders are often in a position to dictate standards to smaller and less powerful producers, which may end up being excluded from certification schemes altogether if they cannot afford the investment necessary for the certification process. This has been the case for soya[47] and for independent palm oil smallholders.[48]

Failure of schemes to adhere to best practice standards

The ISEAL Alliance aims to strengthen sustainability standards and provides a 'regulatory' framework for certification schemes. Its membership is open to all multi-stakeholder sustainability standards and accreditation bodies that demonstrate their ability to meet the ISEAL Codes of Good Practice and accompanying requirements, which emphasise transparency, openness and broad stakeholder consultation and dialogue.[49] ISEAL membership is an indicator of scheme strength and thus is important for certification schemes. However, not all schemes are ISEAL members, and for those that are, the extent to which they actually adhere to the Codes remains an open question.

Certification schemes can also apply to be 'subscribers', rather than members, but that only requires them to commit to the organisation's mission and not to demonstrate compliance with the Codes of Good Practice.[50] This therefore is even less of a guarantee of system strength than full membership.

Schemes that are not ISEAL members or subscribers, such as Malaysian Sustainable Palm Oil (MSPO) and Indonesian Sustainable Palm Oil (ISPO, where CBs are accredited by the ISPO Commission), often use national accreditation bodies, which lack the comprehensiveness, independent guidance and oversight.[51]

STANDARDS

Differing scope of standards

Certification schemes have emerged sector by sector and do not all share the same scope. For example, they may cover certain key risk areas, such as environmental

[46] Changing Markets Foundation (2018) pp.19-20
[47] Elgert, L. (2012) p.296
[48] OECD (2016), Rietberg, P., & Slingerland, M. (2016)
[49] ISEAL Alliance (2014); see also ISEAL Alliance, ISEAL members [Website]
[50] ISEAL Alliance, Become a subscriber [Website]
[51] See Malaysian Palm Oil Certification Council, Accreditation of certification bodies [Website] and Ministry of Agriculture of the Republic of Indonesia et al. (2015).

damage or Indigenous rights, but not address others, such as the use of child labour, pesticides or genetically modified organisms (GMOs). In order to be truly effective, a certification scheme needs to address all of the following: deforestation (conversion of forest to plantation or farmland) and forest degradation; degradation and conversion of other ecosystems, including peatlands; restoration of converted ecosystems and restitution of social harms; cut-off dates after which ecosystem conversion is prohibited; protection of high conservation values (HCVs), High Carbon Stock (HCS) forests, conservation areas and Intact Forest Landscapes (IFLs); Free, Prior and Informed Consent (FPIC); indigenous and community land rights; and labour rights. These are thus key issues against which schemes are assessed in this report. More broadly, for certification to be consistent with holistic efforts to address the multiple pressures on biodiversity and ecosystem health it would need to require ecological production,[52] including prohibiting the use of synthetic pesticides or GMOs.

Furthermore, most certification schemes focus on products only, rather than considering a producer's[53] behaviour and impacts at a broader landscape level. This frequently results in consumers being offered certified 'sustainable' products containing commodities produced by companies that are still actively involved in deforestation, human rights abuses or other problematic issues elsewhere, as only a part of their production is required to comply with the given certification criteria.[54]

Lack of group-level accountability

The preceding situation is exacerbated by the widespread failure of certification schemes to take account of the relevant activities of all companies within a producer group[55] and to require group-wide compliance with the certification criteria (see 'Traceability and transparency' below). The FSC is a notable exception with its Policy for Association,[56] but it nevertheless uses a rather weak definition of what an 'associated organization or individual' is. In addition, its enforcement of the policy is limited, inconsistent and very slow.[57] The RSPO also requires membership (and thus compliance) to extend to all companies within a corporate group that have an interest in palm oil;[58] however, it frequently fails to enforce this requirement, in part as a result of

[52] See Greenpeace (2015).

[53] The AFi defines a producer as 'The owner or manager of a farm, estate, plantation, or ranch used to produce agricultural products, or of a forest that is managed at least in part for the harvest of forest products. This includes smallholders, producer groups, and production systems owned or managed by communities.' See Accountability Framework Initiative, Definitions – Different types of supply chain actors [Website].

[54] Changing Markets Foundation (2018). NGOs have repeatedly called out the RSPO for its failures in this area; see eg EIA (2015), Greenpeace (2018b) and Rainforest Action Network (2017, 12 June).

[55] The AFi defines a corporate group as 'The totality of legal entities to which the company is affiliated in a relationship in which either party controls the actions or performance of the other.' See Accountability Framework Initiative, Definitions – Different types of supply chain actors [Website].

[56] FSC (2009)

[57] The FSC's case tracker includes details on complaints where the resolution process has extended over several years. See FSC, Current cases [Website].

[58] RSPO (2017c) pp.6-9

the complex, informal and opaque structures of many corporate groups within the industry.[59]

Weakening of standards through adaptation to local conditions

Most certification schemes have the ability to change their standards (normally at the 'indicator' level) for different countries or regions to suit local conditions or national contexts. The FSC relies on this flexibility for the implementation of its global Principles and Criteria for Forest Stewardship,[60] the RSPO allows 'national interpretations' of its Principles and Criteria[61] and the PEFC is simply a collection of different national standards.[62] While some scope for adaptation to national contexts is an advantage, this approach can result in a weakening of standards where the national standards depart considerably from the global principles and criteria.

Jurisdictional-level application unproven

Some certification schemes are moving to jurisdictional certification. This means that a whole district, province, state or even country is being certified, rather than an individual concession or management unit. For example, the RSPO is developing a jurisdictional approach to certification and is in the process of certifying in their entirety the state of Sabah in Malaysia, the district of Seruyan in Central Kalimantan, Indonesia, and Ecuador.[63] The idea behind this approach is to act as a catalyst for a broader commitment to sustainability with the support of multiple stakeholders (local governments, producers, civil society organisations and purchasers) and to reduce the costs of certification by spreading them more widely. The challenges are that compliance will need to be mandatory to ensure all producers in a jurisdiction are committed to and compliant with the standard, and it will require legal reforms and the engagement of a range of government agencies.[64] To date there has been no successful jurisdictional-level certification.

Used to signal compliance with legislation

In some cases certification is used to show compliance with legal environmental requirements. For example, the EU RED sets out sustainability criteria for biofuels produced or consumed in the EU, and producers can demonstrate compliance with these criteria through certification by a national scheme or a voluntary scheme recognised by the European Commission (such as ISCC).[65] However, as explained below (page x), the EU Court of Auditors has found the system that should ensure the transparency and reliability of certification systems used in the context of the EU RED to have several deficiencies, calling into question the validity of the choices made by the EU legislator.

A larger issue is that if, as argued in this paper, certification on its own is unable to guarantee that commodity production is entirely free of deforestation, human rights

[59] See eg Greenpeace (2018a) and Greenpeace (2019a).
[60] FSC (2015a)
[61] RSPO, National interpretations [Website]
[62] PEFC, Adapting global standards to local needs [Website]
[63] RSPO (2019, 24 June)
[64] Colchester, M., et al. (2020).
[65] European Commission, Voluntary schemes [Website]

abuses or other harms, there is little to suggest that using certification as a tool for proving compliance with legislation could solve the issues in supply chains. Moreover, if certification through a particular scheme is deemed an indicator of legal compliance, incentives to improve the scheme or come up with a better alternative are reduced, creating the risk of greenwashing becoming institutionalised.

TRACEABILITY AND TRANSPARENCY

Lack of traceability and transparency conceal problems in the supply chain

Most certification schemes require only a minimal level of traceability and transparency. With the exception of the RSPO[66] and FSC,[67] which do so to a limited extent, none of the major schemes publish maps of certified companies and areas or details of who owns them. None of the schemes require full transparency concerning either the ultimate ownership of certified companies or the full extent of the (informal) producer groups to which they may belong. This makes it impossible for buyers to avoid certified suppliers that belong to corporate producer groups involved in unsustainable production of commodities through some of their other, uncertified, subsidiaries. Further, most schemes do not require the provision of maps or data for publication on remaining natural ecosystems or conservation values in certified areas, or publication of details on social conflicts or grievances.

The lack of an unbroken traceability system enabling commodities to be tracked from source to end product and vice versa makes it impossible for certification schemes, let alone downstream companies and consumers, to ensure that destruction or degradation of forests and other ecosystems and human rights abuses are excluded from the production of a commodity.[68] Technology to enable full traceability and transparency exists,[69] including artificial intelligence tools, so feasibility is not the stumbling block – the issue rather seems to be one of reluctance on the part of manufacturers, processors and retailers. This might stem from their unwillingness to pay extra to ensure full segregation,[70] or from a fear that traceability will make it impossible to conceal harmful or destructive practices in commodity production, increasing the pressure on these companies to solve these problems.

Mixing certified with uncertified commodities, allowing deforestation to continue

Even some of the better certification schemes include an option for downstream companies to buy commodities certified under mixed systems such as ‘mass balance’ and ‘book and claim’ (aka ‘certificate trading’).[71]

[66] RSPO, GeoRSPO [Website]. See the section on the RSPO in Chapter 2 for further details.
[67] FSC, FSC on the map [Website]; see also Worm, L.D. (2019, 5 September)
[68] Smit, H., McNally, R., & Gijsenbergh, A. (2015)
[69] See eg Hirbli, T. (2018) and Saberi, S., et al. (2018).
[70] Where certified feedstock is kept separate from any uncertified feedstock throughout the supply chain. Segregation is one of the most expensive supply chain models to implement, second only to identity preservation (IP). See eg Mol, A., & Oosterveer, P. (2015) and RSPO (n.d.-a) pp.5-6.
[71] See eg Forum Nachhaltiges Palmöl, Trade options [Website].

Under the **book and claim model** (used for example by the RSPO[72]), producers receive 'credits' for each tonne of certified commodity they produce; however, the commodity is then mixed with uncertified product, rather than being segregated or tracked through the supply chain. Downstream companies that have purchased quantities of uncertified commodity on the open market can then buy corresponding quantities of credits, enabling them to claim to be supporting certified production. The revenue from sold credits is intended to encourage and support the transition of producers to adherence to the certification standards.[73]

Under the **mass balance model**, certified commodity is mixed with uncertified commodity throughout the supply chain and this mixed commodity is sold to end users as "certified mixed commodity". Accounting systems track the quantity of certified commodity passing through the supply chain to the market, and in theory only this volume is able to be labelled or claimed as certified. This approach enables the costs of setting up infrastructure for segregated supply chains to be avoided.[74]

Such mixed sourcing models allow supply chains to continue to be filled with commodities associated with deforestation and other social and ecological harms. Companies that purchase commodities or products made from commodities traded through these supply chain models may therefore be inadvertently supporting producers that continue to engage in deforestation and/or human rights abuses. They are also misleading consumers if they claim that the products made with these commodities are 'sustainable'.

Summary reports or results of audit assessments not made public

An important element of transparency and therefore increased accountability and credibility of a certification scheme is the publication of key documents or information relating to the certification assessments. This allows stakeholders to view the performance certified areas against the certification schemes standards and process requirements. There is variation across schemes from no transparency at all to summary reports of audits being made publicly available.

AUDITING

Only part of the supply chain is checked

Certification schemes often only specify performance standards for the primary producer or processor.[75] In the case where there are multiple certificates used in the supply chain, they are often audited by different CBs. The problem is that the audits are done separately, and critical information – particularly concerning certified volumes of the commodity concerned – is not passed down the supply chain and shared with the CBs

[72] RSPO, RSPO supply chains [Website]
[73] SPOTT, GreenPalm: Smallholders [Website]. See also Changing Markets Foundation (2018) p.39.
[74] See eg Forum Nachhaltiges Palmöl, Trade options [Website].
[75] See for example GreenPalm, What is GreenPalm? [Website].

that are auditing the buyers of these products. This creates the opportunity for fraudulent labelling of uncertified material as certified. At present, no scheme has implemented a system that comprehensively tracks the movement or transformation of commodities all the way through the supply chain (the exception is the 'identity preserved' supply chain model, but because of the high costs associated with this system its use is relatively rare[76]). The FSC has developed a transaction verification system, but it is applied only in limited circumstances in relation to risk.[77] This lack of full traceability and volume tracking renders claims made about so-called 'sustainable' certified sources questionable.

Limited independence of certification bodies

It is common practice for certification bodies to be paid directly by the clients they are auditing, who can always choose another CB if they are dissatisfied with the results of an audit. The CBs' financial dependence on the clients they are certifying creates an intrinsic conflict of interest, potentially encouraging them to give unduly favourable audit results in order to keep their clients. As well, auditors may become overly familiar with their clients over time, which might cause them to overlook issues that they have become habituated to seeing.[78]

Contractual obligations between CBs and the companies they certify can also be a complicating factor. Global Witness investigations have revealed that 'contractual obligations between the FSC's certifying bodies and the companies they certify leave them with little power to take action against subsidiaries', because the FSC 'is unable to act as both certifier and complainant'.[79] In some cases such a lack of independence may lead to enabling full-blown corruption, as was recently alleged by Earthsight in their reports on illegal logging in Ukraine.[80]

Research suggests that having a 'firewall' between CBs and their clients improves the strength of environmental standards auditing.[81] There is greater acknowledgement of this issue as threat to certification integrity[82] but with limited examples of alternative approaches, voluntary schemes are reluctant to adopt innovations to address the issue. Proposals include: rotation of the CB and it's auditors, having the certification fee be held in a escow account and withheld until the assessment report has been validated, a tender process after which a third party decides on the CB for a client, flat price audits, and free audits funded by other means or levies.

IMPLEMENTATION

[76] Mol, A., & Oosterveer, P. (2015). See also eg RSPO (n.d.-a) p.5.
[77] FSC, Transaction verification [Website]
[78] Jennings, S. (2016) pp.8-9. See also Duflo, E., et al. (2012), EIA (2015), EIA (2019) and Hines, A. (2014, 12 September).
[79] Hines, A. (2014, 12 September)
[80] Earthsight (2018), Earthsight (2020)
[81] Eg Duflo, E., et al. (2012).
[82] Mike Read Associates (2020) pp. 32-43

Reported violations of certification standards

Certification schemes often fall short not only in their definition of the standards themselves but – even more importantly – in how those standards are interpreted, implemented and enforced. For example, numerous case studies from across forest regions show that RSPO certification has been granted to companies that have been reported to be involved in deforestation, land disputes, destruction of Indigenous livelihoods, agrochemical pollution and cutting communities off from their drinking water supplies.[83]

Weak penalties for companies breaching criteria

When companies breach certification standards, the consequences are not necessarily swift or severe. In some cases the auditors appear inclined to be lenient; in others, audits may fail to pick up issues or take a long time to do so (for example when parts of a farm or concession are audited only every few years). Typically, the most extreme sanction for a very serious breach of a certification scheme's conditions is for a producer's certification to be terminated immediately. The producer's membership in the scheme may also be revoked. For less serious infractions, the certification may only be suspended. However, in practice certificate holders that have breached the principles or criteria of a certification scheme do not normally have their certificates suspended or terminated immediately. Rather, they are given time to achieve compliance, on the questionable basis that engagement with non-compliant companies is a more effective driver of change than excluding them from the scheme. Despite the use of pass/fail certification criteria and indicators, the approach thus involves 'continuous improvement' and 'inclusiveness', while full compliance – and therefore true sustainability – remains a distant goal.

Even if a producer's certification is withdrawn and the producer ultimately suspended or expelled from the scheme, this does not necessarily lead to satisfaction or compensation for communities and individuals who may have lost their land, livelihoods, cultural sites or clean water supply as a result of the producer's activities. Most certification schemes have a dispute or grievance mechanism that enables complaints to be made against certified companies and operations, the CBs and the scheme itself. However, these mechanisms and the cases heard under them are often neither made public nor addressed in a timely and comprehensive manner. Moreover, most schemes do not provide for compensation to be paid to people affected by loss of land or livelihood or other human rights violations, nor do they have mechanisms in place for remediation or restoration of damage to ecosystems. And if they do have any provisions of this kind, their scope and effectiveness are often limited.

Details on the implementation and effectiveness of individual schemes are provided in the following chapter.

[83] See eg Greenpeace (2019a) and World Rainforest Movement (2018, 16 November).

Chapter 2 - Analysis of the major certification schemes

INTRODUCTION

This chapter analyses a number of certification schemes, focusing on five key areas: governance and decision making, standards, traceability and transparency, audits, and implementation and effectiveness. Because there are too many schemes for this paper to be able to consider all of them in detail, the schemes discussed are those that are most widely used and/or that are claimed by governments and corporations to exemplify best practice. The chapter is structured by commodity and focuses on those that currently pose the greatest risk to forests and ecosystems, namely biofuels, cattle, cocoa and coffee, palm oil, soya and wood products. Each of the schemes has also been evaluated against a range of indicators, as shown in the table

SOYA CERTIFICATION SCHEMES

Round Table on Responsible Soy (RTRS)

Summary

RTRS certification is often considered by the industry as one of the best of its kind, with buyers making claims that if they purchase 100% RTRS soy, their products are 'deforestation free'. But this is a highly problematic claim, as the vast majority of RTRS soya sales are based on credits, rather than physical flows of soya. Buyers thus do not know the origin of the actual product they are buying, and risk unwittingly supporting producers engaging in deforestation. Buying credits is intended to encourage farmers to seek certification, but the premium farmers receive for credits is too low to compensate them for not clearing land for soya production. As a result it is likely that most certified farms would not have engaged in land conversion even without the RTRS. On top of that companies can sell RTRS soya or credits from their certified farms while still deforesting on non-certified farms. Claims of certified soya being deforestation free are therefore misleading, allowing companies a green image while it is still likely they are contributing to human rights abuses and/or the destruction of nature.

Governance and decision making

- The RTRS was initially conceived in 2004 by a committee whose members – Grupo Amaggi, Unilever, COOP, WWF, Dutch development organisation Cordaid and Brazilian smallholder organisation Fetraf-Sul – came together to prepare an international conference on responsible soya. Cordaid and Fetraf-Sul reportedly left the organisation committee in 2005 because they disagreed with the RTRS, formally established in 2006, not excluding GMO soya from the standard.[286] The scheme's principles and criteria were adopted in 2010 after a series of consultations.[287]
- The General Assembly is the RTRS's highest decision-making body. All members, including both participants and observers, take part, though only participating members have a vote.[288]
- The RTRS's Executive Board is composed of a maximum of 15 representatives from each of the three member constituencies (producers; industry, trade and finance; civil society), which all have the same voting rights regardless of their share in membership.[289] The multi-stakeholder governance model ensures that decision making is balanced.[290]
- The RTRS is a subscriber to the ISEAL Alliance, but not a full member.[291]

Standards

- The RTRS production standard forbids conversion of 'natural lands' after June 2016.[292] However, expansion of soya production is allowed in areas of high importance for biodiversity if carried out with an HCV assessment.[293]
- For areas critical for biodiversity (hotspots), which includes nearly all the Brazilian Amazon, the cut-off date is May 2009.[294] This means that although newly converted land is not eligible for RTRS certification, nearly all historical conversion is accepted, except in HCV areas.
- National interpretations of the standard are available, taking into account differences in regulations and production standards.[295]
- The RTRS allows GMO soya but ensures that it is not mixed with non-GMO certified material.[296]

Traceability and transparency

- There are two ways to buy RTRS certified soya: in the form of credits (where producers earn one credit for each tonne of certified soya they produce, and buyers can purchase credits to support responsible soya production) or physical flows.[297] Both options are available via the RTRS's online marketplace, and non-

[286] Hospes, A., van der Valk, O., & van der Mheen-Sluijer, J. (2012) pp.38-40
[287] Hospes, A., van der Valk, O., & van der Mheen-Sluijer, J. (2012) pp.41-43
[288] RTRS, Who we are [Website]; see also RTRS, Members [Website]
[289] RTRS, Who we are [Website]
[290] WWF (2013) p.29
[291] ISEAL Alliance, Members and subscribers [Website]
[292] RTRS (2017) pp.23-24
[293] RTRS (2017) p.41
[294] RTRS (2017) pp.23-24
[295] RTRS, National interpretations [Website]
[296] RTRS (2018) pp.19-21
[297] RTRS, RTRS soy [Website]

GMO options exist for both.[298] The vast majority of RTRS soya sales are based on credits rather than physical flows of soya.[299] As with all such systems, buyers risk inadvertently supporting deforestation, as they do not know the origin of the actual product they are buying – the certified soya enters the general supply chain and is sold as non-RTRS certified.[300]

- When RTRS certified physical material is purchased, it is monitored throughout the supply chain, and certification applies to both producers and supply chain actors. There are three supply chain models: segregated, mass balance, and country material balance (a mass balance accounting system implemented at the national level).[301]
- Updates on certified producers and certified volumes are available in the Marketplace section of the RTRS website.[302] Annual audit reports contain information on certified farms and their locations, and producer audits are published on the RTRS website.[303] The level of transparency the scheme offers is thus relatively high.[304]
- The RTRS has a grievance procedure,[305] but complaints do not appear to be published, which makes it impossible to say how they are dealt with.

Audits

- RTRS-endorsed accreditation bodies are responsible for accrediting and auditing CBs for the scheme.[306]
- The RTRS requires CBs to consult with affected stakeholders during audits, contributing to the level of assurance the scheme offers.[307]
- Producer audits are only carried out on a producer's certified farms and not at the whole producer or company level.[308] This means that companies can sell RTRS soya or credits from their certified farms while still being involved in deforestation on non-certified farms.

Implementation and effectiveness

- The premium farmers receive for credits (reportedly around 0.5% of the soya price)[309] is seen as too low to compensate them for not engaging in land conversion. As a result it is likely that most certified farms would not have

[298] RTRS, Marketplace [Website] and RTRS soy [Website]
[299] Data on credits buyers and physical soya buyers is available from the RTRS Marketplace. See RTRS, Marketplace [Website].
[300] RTRS, RTRS soy [Website]
[301] RTRS, RTRS soy [Website]; see also RTRS (2018).
[302] RTRS, Marketplace - Certified volumes and producers [Website]
[303] RTRS, Public audit reports [Website]
[304] Kusumaningtyas, R., & van Gelder, J. W. (2019) p.22
[305] RTRS (2019)
[306] RTRS, What are the benefits of RTRS certification? [Website]
[307] Kusumaningtyas, R., & van Gelder, J. W. (2019) p.21
[308] RTRS (2017)
[309] Solidaridad (2020, 9 April)

engaged in land conversion even without the RTRS. They are mostly located in areas with a long agricultural history.[310]

- SLC Agrícola is an example of a soya producer in the Cerrado that has RTRS certification for some of its farms[311] but has reportedly engaged in repeated large-scale deforestation on other farms which are not certified (see earlier case study).[312]

ProTerra

Summary

ProTerra has stricter sustainability criteria than the RTRS, prohibiting conversion of natural vegetation and HCV areas after 2008, excluding GMO crops and providing a system of identity preservation (IP) – that is, traceability of an individual certified producer's soya throughout the supply chain. However, producer certification applies only to the farms a producer chooses to have certified, rather than to all of a producer's or company's farms. This means companies can be involved in deforestation or violations of economic, social and cultural rights on non-certified farms and can pick and choose which farms to have certified. Thus, buyers who choose to support ProTerra certified operations might be filling the coffers of parent companies engaging in destructive practices elsewhere. Also problematic is the lack of transparency: detailed production or trade data at the company level is not available, producer audits are not made public and details of complaints are not released, so it is difficult to verify the effectiveness of the standard's implementation.

Governance and decision making

- The ProTerra standard was established in 2006 by FoodChain ID (previously Cert ID). The ProTerra Foundation became independent in 2012. Standard revisions are developed through a multi-stakeholder process with input from internal and external actor groups.[313]
- The Board of Directors is the main decision-making body, comprising four directors. Two of the current directors are also connected to FoodChain ID, which carries out the ProTerra audits.[314] The Stakeholder Council has a strategic advisory role; it is composed of between three and nine members, with the current composition representing one soy producer, three feed companies, one food manufacturer and one food retailer.[315]
- ProTerra is a subscriber to the ISEAL Alliance.[316]

Standards

- The ProTerra standard is based on the Basel Criteria on Responsible Soy, published in 2004 by WWF and Coop Switzerland,[317] but also applies to

[310] Cameron, B. (2017)
[311] SLC Agrícola, Our farms [Website]
[312] Chain Reaction Research (2020, 17 April) and Chain Reaction Research (2019, 9 May)
[313] ProTerra Foundation (2019e)
[314] ProTerra Foundation, About us [Website]
[315] ProTerra Foundation, About us [Website], ProTerra Foundation (2019d)
[316] ISEAL Alliance, Members and subscribers [Website]

commodities other than soya. These criteria exclude GMO crops and require identity preservation – that is, traceability of an individual certified producer's soya throughout the supply chain.[318]

- The cut-off date for the conversion of native vegetation and HCV areas is 2008.[319]
- For ProTerra the unit of certification includes the entire farm.[320] However, producer certification applies only to the farms a producer chooses to have certified, rather than to all of a producer's or company's farms. This means companies can be involved in deforestation in non-certified farms and can pick and choose which farms to have certified (as CRR reports in the case of SLC Agrícola; see case study in Chapter 1).

Traceability and transparency

- ProTerra offers segregated and mass balance chain of custody options. In the latter case ProTerra soya is mixed only with non-GMO non-ProTerra soya.[321]
- Detailed production or trade data at the company level is not available, but ProTerra does provide summary information on the compliance of its members.[322]
- ProTerra aims by the end of 2020 to have primary data available on GHG emissions associated with soya cultivation and processing, soymeal production and transport to port for its certified soya.[323]
- ProTerra has grievance procedures[324] but until now has not released details of complaints, which makes it impossible to say how they are being dealt with. It does not rule out making details public depending on the case.[325]
- Producer audits are not made public.

Audits

- ProTerra has only one approved CB (FoodChain ID).[326]
- Two of ProTerra's directors are the President & CEO and a director at FoodChain ID,[327] which undermines the independence of the auditing company.

Implementation and effectiveness

- ProTerra offers fairly comprehensive provisions related to forests, wetlands and biodiversity conservation; however it is difficult to verify implementation as it is lacking in transparency in comparison to the RTRS scheme.[328]

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[317] ProForest (2004)
[318] ProTerra Foundation (2019c) pp.32-35
[319] ProTerra Foundation (2019c) p.29
[320] ProTerra Foundation (2019c) p.8
[321] ProTerra Foundation (2019c) pp.53-56
[322] ProTerra Foundation (2019b)
[323] ProTerra Foundation (2020, 17 February)
[324] ProTerra Foundation (2019a) and ProTerra Foundation (2019c) pp.26-27
[325] Correspondence with Greenpeace, April 2020.
[326] ProTerra Foundation (2019c) p.57
[327] ProTerra Foundation, About us [Website]
[328] Kusumaningtyas, R., & van Gelder, J. W. (2019) p.27

- In the case of ProTerra, growth is hindered by the low amount of GMO-free soya production.[329]
- SLC Agrícola is an example of a soya producer in the Cerrado that has ProTerra certification for some of its farms[330] but has reportedly engaged in deforestation and conversion of large areas of native vegetation on other farms which are not certified (see earlier case study).[331]

European Feed Manufacturers' Federation (FEFAC)

FEFAC represents European feed associations in 22 EU member states as well as associations in Switzerland, Turkey, Norway, Serbia and Russia (observer/associate members).[332] In 2015 it released its Soy Sourcing Guidelines,[333] providing recommendations on sourcing responsible soy. The guidelines comprise 37 'essential' and 22 'desired' criteria including legal compliance, responsible working conditions, environmental responsibility, good agricultural practices, respect for land rights and maintaining good community relations.[334] At present 18 schemes and standards are considered to be compliant with the guidelines, of which six are traders' own schemes.[335]

The essential criteria state that operations that have engaged in *illegal* deforestation after 2008 should not be certified and that certified companies should be required to comply with all relevant legislation (forest conservation, biodiversity, ownership etc).[336] So, as long as operators stay within the law, they are effectively complying with the FEFAC guidelines. A study by Profundo analysing 17 certification standards endorsed under the FEFAC soya guidelines showed that 10 of the standards prohibit only illegal deforestation. Just seven of the standards exclude deforestation and conversion of all native vegetation after 2008 or 2009.[337]

However, in many countries legal compliance is not enough to halt deforestation and conversion of areas with high biodiversity. Large areas of savanna could, for example, be legally converted in the Brazilian Cerrado biome, an area of enormous ecological value that has already lost half of its natural vegetation and remains under threat.[338]

Companies and/or countries publicly claim they aim for 100% sustainability by sourcing soya under schemes that are compliant with the FEFAC guidelines. However, such general guidelines that apply to a number of schemes are only as strong as their weakest link. In the case of FEFAC, because the majority of the certification schemes only require compliance with local or national laws instead of enforcing true sustainability criteria,

[329] Cabezas, S. C., et al. (2019) pp.48,51
[330] SLC Agrícola, Our farms [Website]
[331] Chain Reaction Research (2020, 17 April) and Chain Reaction Research (2019, 9 May)
[332] FEFAC, Presentation [Website]
[333] FEFAC, FEFAC tools & actions to support mainstream market transition of responsible soy [Website]
[334] FEFAC, Responsible sourcing [Website]
[335] FEFAC, FEFAC tools & actions to support mainstream market transition of responsible soy [Website]
[336] FEFAC (2016) p.18
[337] Kusumaningtyas, R., & van Gelder, J. W. (2019) p.2
[338] Greenpeace (2019c) p.6

sourcing from schemes that adhere to the FEFAC guidelines can in no way be considered proof that a company is sourcing products with no links to forest or ecosystem destruction and/or human rights abuses.

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Certifying destruction

Certification is not a solution to deforestation, forest degradation and other ecosystem conversion

Introduction

The purpose of this paper is to document the limitations of voluntary private-sector commodity certification schemes – hereafter referred to as 'certification schemes' – in addressing deforestation, ecosystem destruction and human rights abuses and helping to tackle the wider climate and biodiversity emergencies.

The world's forests are a crucial defence against spiralling climate change, and are home to many Indigenous and local communities and innumerable species of animals and plants. The destruction of forests further increases the risk of more diseases like COVID-19 emerging, as humans encroach into previously untouched natural habitats and pathogens transfer from wild animals to humans.[1] The current global health crisis and ecological and climate breakdown share many of the same drivers, including the destruction of forests and other natural ecosystems by industrial agriculture. Some 80% of global deforestation is caused by agricultural expansion,[2] either directly or indirectly, by displacing other crops.

This expansion also contributes to the conversion or degradation of other natural ecosystems such as wetlands (especially peatlands), savannahs, shrublands and grasslands.[3] This continuous destruction causes appalling loss of biodiversity,[4] often violates the rights of Indigenous Peoples and other communities and contributes massively to climate change, jeopardising our chances of limiting the global temperature rise this century to 1.5° Celsius – the goal set in the Paris Agreement[5] and reinforced by the latest Intergovernmental Panel on Climate Change (IPCC) report.[6]

In 2010, members of the Consumer Goods Forum (CGF – a global network of major manufacturers, retailers and other stakeholders) set themselves a deadline of 2020 to eliminate deforestation from their supply chains.[7] The same deadline was also set by several international commitments, such as the Amsterdam Partnership Declaration,[8]

[1] Everard, M., et al. (2020)
[2] Kissinger, G., Herold, M., & De Sy, V. (2012)
[3] See eg Bonanomi, J., et al. (2019).
[4] IPBES (2019)
[5] UNFCCC, The Paris Agreement [Website]
[6] IPCC (2018)
[7] Consumer Goods Forum (2010, 29 November)
[8] Seven European countries have signed the Amsterdam Declaration on Deforestation committing to deforestation-free, sustainable commodities. See Amsterdam Declarations Partnership, About [Website].

Target 15.2 of the United Nations Sustainable Development Goals (UN SDGs),[9] Aichi Biodiversity Target 5[10] and the New York Declaration on Forests (NYDF).[11]

Corporations and some governments have for years been advocating for certification as a means of promoting "deforestation-free" supply chains. Since the introduction of Fairtrade and organic food labelling in the 1980s the number of voluntary certification schemes has increased rapidly,[12] and the schemes have expanded to address a range of aspects of the production process, including deforestation and protection of Indigenous rights. These schemes sell themselves on the basis that if demand for 'responsible' or 'sustainable' – ie, certified – soya, palm oil or timber/wood products can be increased, the result will be a decrease in deforestation and other harms linked to the production of these commodities.[13]

Over the years, much effort – including on Greenpeace International's[14] part, working with the Forest Stewardship Council (FSC)[15] and to some degree the Round Table for Sustainable Palm Oil (RSPO)[16] – has been focused on improving the standards and enforcement of such certification schemes. Despite this work, however, certification has failed to help CGF companies meet their 2020 zero-deforestation commitments.[17]

Companies and governments often still look to certification as a viable solution, arguing that if 100% of the supply of a given commodity is certified, deforestation can be addressed. But the global climate, biodiversity and health crisis we are facing requires governments and companies to choose and implement strong measures. False solutions will only distract and delay, eventually putting us all at even greater risk of making this planet uninhabitable. To inform decision making, this paper therefore outlines the limitations of certification schemes, explains the danger of relying on them as a solution and gives recommendations on the kinds of stronger measures that should be taken.

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[9] 'By 2020, promote the implementation of sustainable management of all types of forests, halt deforestation, restore degraded forests and substantially increase afforestation and reforestation globally.' Source: United Nations Sustainable Development Goals Knowledge Platform, Sustainable Development Goal 15 [Website].

[10] 'By 2020, the rate of loss of all natural habitats, including forests, is at least halved and where feasible brought close to zero, and degradation and fragmentation is significantly reduced.' Source: Convention on Biological Diversity, Aichi Biodiversity Targets [Website].

[11] The NYDF includes targets to end natural forest loss by 2030, with a 50% reduction by 2020. In addition, it calls for restoring 350 million hectares of degraded and deforested lands by 2030, supporting the private sector in eliminating deforestation from the supply chains of major agricultural commodities by 2020, and providing financial support to reduce emissions related to deforestation and forest degradation. See New York Declaration on Forests, About [Website].

[12] Liu, P. (2010), OECD (2016)

[13] See eg International Institute for Environment and Development, Four actions to reduce the 'forest footprint' of commodities [Website].

[14] In this report, mentions of 'Greenpeace' should be read as references to Greenpeace International unless otherwise indicated.

[15] See eg Greenpeace (2008a).

[16] Greenpeace Southeast Asia (2018, 15 November)

[17] See Chain Reaction Research (2020, 5 March), Ecobusiness (2018), Global Canopy (2020), Greenpeace (2018b) and Greenpeace (2019c).

The paper begins by defining some of the key concepts used, such as certification schemes, certification bodies, labelling and verification.

Chapter 1 outlines the main limitations of certification schemes as tools to stop deforestation, forest degradation and other ecosystem conversion by producers of commodities such as beef, biofuels, cocoa, coffee, palm oil, soya and wood products.

Chapter 2 supplements this general discussion by detailing the strengths and weaknesses of some individual certification schemes. Because there are too many schemes for this paper to be able to analyse all of them in detail, only some schemes are discussed, with a focus on those that are most widely used and/or that are claimed by governments and corporations to exemplify best practice.

Finally, based on the paper's findings, the conclusions and recommendations discuss whether certification serves its purpose, consider the appropriate role for certification and suggest what measures governments and companies should focus on instead to clean up supply chains. They also give recommendations on what needs to be done beyond cleaning up supply chains in order to protect the world's biodiversity and ecosystems, to limit global warming to below 1.5º C and to help prevent future pandemics.

Certification – definitions

Certification schemes for forest and ecosystem risk commodities set a range of social and environmental standards with which production of these commodities should comply. These standards usually comprise a set of principles and criteria (with the principles setting out the broad elements of the standard and the criteria defining what is required for each element), together with verifiable indicators of compliance with the criteria. An area, product, manufacturer or processor (eg, mill) is certified by a particular certification scheme when it is assessed as meeting the standards set by that scheme. Whereas certification relates to a particular management area or processing facility, membership is what allows an organisation to participate in governance of the scheme. In some schemes (eg the FSC) a company can be a certificate holder but not a member.[18] For other schemes, like the RSPO, membership is a prerequisite for certification.[19] Participation in almost all certification schemes is voluntary, although in some cases the schemes serve to enable companies to comply with legal requirements – for example, compliance with the European Union's Renewable Energy Directive (EU RED) sustainability criteria is ensured by certification schemes such as the International Sustainability and Carbon Certification (ISCC) and REDCert.[20]

Certification is often used by companies that produce or trade forest risk commodities – or manufacture or sell products containing them – to reassure customers that they or

[18] See FSC, Home [Website] and FSC, Members [Website].
[19] RSPO, RSPO certification [Website]
[20] European Commission, Voluntary schemes [Website]

their suppliers have taken steps to minimise the negative environmental and social impacts linked to the production of the commodities concerned, and that their products can therefore be considered '**sustainable**'.[21] Yet no certification scheme can make a claim that its certified products are truly sustainable, as what is actually sustainable in relation to forests, land and agriculture is not known.

Certification **labelling** is a 'promise' that a product meets the criteria set out by a certification scheme, and is mostly done at the consumer goods manufacturers' end.[22] Typically incorporated into a product's packaging, labelling in theory provides the purchaser/consumer with an indication of the product's sustainability.[23] An important aspect of certification is product or material **traceability**, usually carried out via a **chain of custody (CoC)** system and standards. Traceability is defined as the ability to follow a product or its components through stages of the supply chain (eg, production, processing, manufacturing and distribution); this is required if guarantees are to be made about the certification status of a product.

Companies or consultants serving as **certification bodies** (CBs) undertake the task of ensuring, by means of **audits**, that the certified organisations (producers, processors, downstream companies) comply with the required social and environmental criteria. Each CB has an approved list of auditors – typically consultants or employees of the CB – who can perform the audits. The certified organisations themselves are usually responsible for commissioning these third-party audits, and bear the costs.[24] Most certification schemes require CBs to be accredited by a recognised **accreditation body**, such as Assurance Services International (ASI) for the FSC and RSPO.[25] In simple terms, the role of accreditation bodies such as ASI is to ensure that CBs are following the rules set by the certification schemes. Additional oversight of and guidance on sustainability standards is provided by bodies such as the ISEAL Alliance.[26]

Verification is a simpler approach that does not necessarily form part of a certification scheme; it can be defined as the 'assessment and validation of compliance, performance, and/or actions relative to a stated commitment, standard, or target'.[27] An example would be verification of the extent to which a company is complying with its No Deforestation, No Peat, No Exploitation (NDPE) policy.[28] As part of a certification scheme audit, the process of assessing whether organisations are complying with the required social and environmental criteria may also be referred to as verification.[29]

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[21] For example, Unilever defines 'sustainable sourcing' of palm oil as purchasing only from certified sustainable sources. See Unilever (2020) p.3.
[22] Liu, P. (2010)
[23] Retail Forum for Sustainability (2011)
[24] See eg Carlson, K. M., et al. (2017), Food and Agriculture Organization of the United Nations (2018) and Food and Agriculture Organization of the United Nations, Forest certification [Website].
[25] ASI, Scheme owners we work with [Website]
[26] ISEAL Alliance, Who we are [Website]
[27] Accountability Framework Initiative, Definitions – Monitoring, verification, reporting, and claims [Website]
[28] Accountability Framework Initiative, Core principles – 11. Monitoring and verification [Website], Wilmar International (2018)
[29] FSC (2014) p.3

Chapter 1 - Limitations of certification

INTRODUCTION

The effectiveness and credibility of a certification scheme depend on a range of aspects, including its governance; the independence of its financing, processes and decision making; the strength and scope of its standards; physical traceability in the direct supply chain and the transparency of a producer group's[30] entire production activities (not limited to those directly responsible for the certified product); the required frequency of audits and the quality and independence of the auditing system; the auditing system's level of transparency; the possibility of sanctions; and the rigour with which any sanctions are enforced and implemented.

This chapter considers in general terms five aspects of certification schemes that bear on their effectiveness and credibility – namely governance and decision making, standards, traceability and transparency, auditing and implementation. It begins, however, with some reflections on the inherent flaws of certification schemes as a whole.

INHERENT FLAWS OF CERTIFICATION SCHEMES

Focus on strengthening market position, access, and profits rather than sustainability

The market-based nature of certification means that the primary incentive producers have to meet environmental and social standards is the reward of increased market access or price premiums.[31] The focus is on increasing the demand for or market share of 'sustainable' (ie, certified) products, even when the actual sustainability of those products cannot, as this paper argues, be guaranteed.

Another issue is that the very existence of a sustainability certification scheme for a commodity tends to strengthen that particular commodity's market position, and may discourage efforts to promote the substitution of alternative commodities whose production may be less harmful[32] or to decrease the production and consumption of certain forest risk commodities altogether. The RSPO, for example, goes as far as to

[30] The AFi defines a corporate group as 'The totality of legal entities to which the company is affiliated in a relationship in which either party controls the actions or performance of the other.' See Accountability Framework Initiative, Definitions – Different types of supply chain actors [Website].
[31] See Liu, P. (2010) and Pavel, C., et al. (2016).
[32] Changing Markets Foundation (2018) p.86

forbid its members even to 'make claims which imply that the removal of palm oil from a product is a preferable social or environmental sustainability outcome to the use of RSPO certified sustainable palm oil'.[33]

Misleading label of sustainability with wide variation in the quality of certification schemes

There is little consistency between different certification schemes in terms of their definitions of forests and ecosystems that should be protected, their treatment of historical deforestation and their requirements for remediation or restoration. More broadly, there are large differences in the quality and rigour of the standards and their implementation.[34]

Yet because certification is increasingly being equated with sustainability, despite their differences all of these schemes are able to cultivate a positive image.[35] Claims of certified products being 'sustainable' reflect a fundamental dishonesty on the part of the schemes, when in fact it is not known what truly 'sustainable' practices are and the materials present in products may have contributed, directly or indirectly, to clearly unsustainable practices such as the clearance of natural forests or human rights abuses. But the term 'sustainable' will sound positive to the consumer.

Some of the weaker schemes have taken steps to make themselves appear equivalent to the stronger schemes.[36] In some cases this ultimately has a positive effect, with the less robust schemes eventually becoming more similar to the stronger ones.[37] For example, this has been the case with the weaker Programme for the Endorsement of Forest Certification (PEFC) adopting some FSC policies and standards; indeed, in a few countries its forest management standards are identical to the FSC's, with their assessments being carried out jointly.[38] In other cases, however, the result is misplaced consumer confidence in a certification scheme that does not in fact deliver the expected level of 'sustainability' assurance.

In some instances major commodities traders have set up their own voluntary standards, which can have the effect – intentional or not – of undermining more credible schemes and confusing the market. For example, ADM, Amaggi, Bunge and Cargill have their own standards for soya production, all of which require verification by independent auditors. While these standards claim to supply certified sustainable (or 'responsible') soya, their principles and criteria vary greatly and some are extremely weak.[39]

In the case of national or international guidelines with which different certification schemes are deemed to show compliance, the inconsistencies between schemes mean that the guidelines themselves are only as strong as their weakest link. An example is

[33] RSPO (2017a) p.2
[34] A deeper analysis of various land use–related certification schemes can be found in Voigt, M. (Ed.) (2019).
[35] Changing Markets Foundation (2018)
[36] Changing Markets Foundation (2018)
[37] OECD (2016) pp.11-12
[38] PEFC (2017, 12 June)
[39] Kusumaningtyas, R., & van Gelder, J. W. (2019)

the European Feed Manufacturers' Federation (FEFAC) Soy Sourcing Guidelines,[40] which set a sustainability baseline for importing soya into the European market. Of the 18 schemes – four of which are traders' own schemes – that comply with the guidelines and are classified by FEFAC as sustainable, 10 rely on national legislation that differentiates between legal and illegal deforestation. The problem with a focus on illegal deforestation alone is that it does not address deforestation as such. States often legalise deforestation to accommodate soya producers and allow further expansion.[41] A deeper analysis of FEFAC and other guidelines, including PEFC and RED, can be found in Chapter 2.

Shifting responsibility onto consumers

Certification is used to decrease public concerns about destructive producers and to shift responsibility onto consumers themselves. Instead of governments, producers, traders, manufacturers and retailers being responsible for deciding what does and does not come onto the market, that responsibility is being transferred to consumers who decide what to purchase. This transference is not only unjust but also to a large extent ineffective, as the buying choices of a large proportion of consumers are of necessity driven by price rather than environmental and social justice considerations.[42] The global economic recession caused by the COVID-19 crisis – which is having a disproportionate impact on those with limited purchasing power and choice with regard to consumption – has only exacerbated this situation.[43]

Furthermore, the aforementioned variation in the quality of certification schemes may not be clear to consumers, who are often ill equipped to distinguish between commodities certified by weaker and stronger schemes.[44] Consumers typically distinguish only between products labelled as certified and those that are not. Companies using weaker schemes can thus reap the same market benefits as those using stronger schemes, removing much of the incentive for investing in more robust certification.

GOVERNANCE AND DECISION MAKING

Overrepresentation of business actors in decision making

When the performance standards for certification schemes are being developed and implemented, the market interests of influential corporations tend to carry more weight than the interests of Indigenous and local communities, consumers and other stakeholders, or the need to address the relevant social and/or environmental issues in the most effective way possible.[45] The business sector tends to be disproportionately represented in the membership of certification schemes' governing bodies, giving it a larger role in decision making. This is in part also due to the fact that standards are

[40] FEFAC, Responsible sourcing [Website]
[41] Kusumaningtyas, R., & van Gelder, J. W. (2019)
[42] Lehmann, J., & Sheffi, Y. (2019)
[43] Food and Agriculture Organization of the United Nations, Q&A: COVID-19 pandemic – impact on food and agriculture [Website]
[44] OECD (2016)
[45] Marin-Burgos, V., Clancy, J. S., & Lovett, J. C. (2014)

continuously being adapted into complex sets of principles in order to apply them in very different contexts. It is difficult for civil society to keep up with or match the amount of lobbying done by multinational corporations, which have extensive resources to dedicate to preserving their interests.[46] As a result, corporations frequently have greater influence over certification standards than civil society, whereas people and the environment, not corporations, must be at the heart of governance.

Furthermore, larger and more powerful actors such as agribusiness corporations and global traders are often in a position to dictate standards to smaller and less powerful producers, which may end up being excluded from certification schemes altogether if they cannot afford the investment necessary for the certification process. This has been the case for soya[47] and for independent palm oil smallholders[48]

Failure of schemes to adhere to best practice standards

The ISEAL Alliance aims to strengthen sustainability standards and provides a 'regulatory' framework for certification schemes. Its membership is open to all multi-stakeholder sustainability standards and accreditation bodies that demonstrate their ability to meet the ISEAL Codes of Good Practice and accompanying requirements, which emphasise transparency, openness and broad stakeholder consultation and dialogue.[49] ISEAL membership is an indicator of scheme strength and thus is important for certification schemes. However, not all schemes are ISEAL members, and for those that are, the extent to which they actually adhere to the Codes remains an open question.

Certification schemes can also apply to be 'subscribers', rather than members, but that only requires them to commit to the organisation's mission and not to demonstrate compliance with the Codes of Good Practice.[50] This therefore is even less of a guarantee of system strength than full membership.

Schemes that are not ISEAL members or subscribers, such as Malaysian Sustainable Palm Oil (MSPO) and Indonesian Sustainable Palm Oil (ISPO, where CBs are accredited by the ISPO Commission), often use national accreditation bodies, which lack the comprehensiveness, independent guidance and oversight.[51]

STANDARDS

Differing scope of standards

Certification schemes have emerged sector by sector and do not all share the same scope. For example, they may cover certain key risk areas, such as environmental

[46] Changing Markets Foundation (2018) pp.19-20
[47] Elgert, L. (2012) p.296
[48] OECD (2016), Rietberg, P., & Slingerland, M. (2016)
[49] ISEAL Alliance (2014); see also ISEAL Alliance, ISEAL members [Website]
[50] ISEAL Alliance, Become a subscriber [Website]
[51] See Malaysian Palm Oil Certification Council, Accreditation of certification bodies [Website] and Ministry of Agriculture of the Republic of Indonesia et al. (2015).

damage or Indigenous rights, but not address others, such as the use of child labour, pesticides or genetically modified organisms (GMOs). In order to be truly effective, a certification scheme needs to address all of the following: deforestation (conversion of forest to plantation or farmland) and forest degradation; degradation and conversion of other ecosystems, including peatlands; restoration of converted ecosystems and restitution of social harms; cut-off dates after which ecosystem conversion is prohibited; protection of high conservation values (HCVs), High Carbon Stock (HCS) forests, conservation areas and Intact Forest Landscapes (IFLs); Free, Prior and Informed Consent (FPIC); indigenous and community land rights; and labour rights. These are thus key issues against which schemes are assessed in this report. More broadly, for certification to be consistent with holistic efforts to address the multiple pressures on biodiversity and ecosystem health it would need to require ecological production,[52] including prohibiting the use of synthetic pesticides or GMOs.

Furthermore, most certification schemes focus on products only, rather than considering a producer's[53] behaviour and impacts at a broader landscape level. This frequently results in consumers being offered certified 'sustainable' products containing commodities produced by companies that are still actively involved in deforestation, human rights abuses or other problematic issues elsewhere, as only a part of their production is required to comply with the given certification criteria.[54]

Lack of group-level accountability

The preceding situation is exacerbated by the widespread failure of certification schemes to take account of the relevant activities of all companies within a producer group[55] and to require group-wide compliance with the certification criteria (see 'Traceability and transparency' below). The FSC is a notable exception with its Policy for Association,[56] but it nevertheless uses a rather weak definition of what an 'associated organization or individual' is. In addition, its enforcement of the policy is limited, inconsistent and very slow.[57] The RSPO also requires membership (and thus compliance) to extend to all companies within a corporate group that have an interest in palm oil;[58] however, it frequently fails to enforce this requirement, in part as a result of

[52] See Greenpeace (2015).

[53] The AFi defines a producer as 'The owner or manager of a farm, estate, plantation, or ranch used to produce agricultural products, or of a forest that is managed at least in part for the harvest of forest products. This includes smallholders, producer groups, and production systems owned or managed by communities.' See Accountability Framework Initiative, Definitions – Different types of supply chain actors [Website].

[54] Changing Markets Foundation (2018). NGOs have repeatedly called out the RSPO for its failures in this area; see eg EIA (2015), Greenpeace (2018b) and Rainforest Action Network (2017, 12 June).

[55] The AFi defines a corporate group as 'The totality of legal entities to which the company is affiliated in a relationship in which either party controls the actions or performance of the other.' See Accountability Framework Initiative, Definitions – Different types of supply chain actors [Website].

[56] FSC (2009)

[57] The FSC's case tracker includes details on complaints where the resolution process has extended over several years. See FSC, Current cases [Website].

[58] RSPO (2017c) pp.6-9

the complex, informal and opaque structures of many corporate groups within the industry.[59]

Weakening of standards through adaptation to local conditions

Most certification schemes have the ability to change their standards (normally at the 'indicator' level) for different countries or regions to suit local conditions or national contexts. The FSC relies on this flexibility for the implementation of its global Principles and Criteria for Forest Stewardship,[60] the RSPO allows 'national interpretations' of its Principles and Criteria[61] and the PEFC is simply a collection of different national standards.[62] While some scope for adaptation to national contexts is an advantage, this approach can result in a weakening of standards where the national standards depart considerably from the global principles and criteria.

Jurisdictional-level application unproven

Some certification schemes are moving to jurisdictional certification. This means that a whole district, province, state or even country is being certified, rather than an individual concession or management unit. For example, the RSPO is developing a jurisdictional approach to certification and is in the process of certifying in their entirety the state of Sabah in Malaysia, the district of Seruyan in Central Kalimantan, Indonesia, and Ecuador.[63] The idea behind this approach is to act as a catalyst for a broader commitment to sustainability with the support of multiple stakeholders (local governments, producers, civil society organisations and purchasers) and to reduce the costs of certification by spreading them more widely. The challenges are that compliance will need to be mandatory to ensure all producers in a jurisdiction are committed to and compliant with the standard, and it will require legal reforms and the engagement of a range of government agencies.[64] To date there has been no successful jurisdictional-level certification.

Used to signal compliance with legislation

In some cases certification is used to show compliance with legal environmental requirements. For example, the EU RED sets out sustainability criteria for biofuels produced or consumed in the EU, and producers can demonstrate compliance with these criteria through certification by a national scheme or a voluntary scheme recognised by the European Commission (such as ISCC).[65] However, as explained below (page x), the EU Court of Auditors has found the system that should ensure the transparency and reliability of certification systems used in the context of the EU RED to have several deficiencies, calling into question the validity of the choices made by the EU legislator.

A larger issue is that if, as argued in this pape[illegible]certification on its own is unable to guarantee that commodity production is entirely free of deforestation, human rights

[59] See eg Greenpeace (2018a) and Greenpeace (2019a).
[60] FSC (2015a)
[61] RSPO, National interpretations [Website]
[62] PEFC, Adapting global standards to local needs [Website]
[63] RSPO (2019, 24 June)
[64] Colchester, M., et al. (2020).
[65] European Commission, Voluntary schemes [Website]

abuses or other harms, there is little to suggest that using certification as a tool for proving compliance with legislation could solve the issues in supply chains. Moreover, if certification through a particular scheme is deemed an indicator of legal compliance, incentives to improve the scheme or come up with a better alternative are reduced, creating the risk of greenwashing becoming institutionalised.

TRACEABILITY AND TRANSPARENCY

Lack of traceability and transparency conceal problems in the supply chain

Most certification schemes require only a minimal level of traceability and transparency. With the exception of the RSPO[66] and FSC,[67] which do so to a limited extent, none of the major schemes publish maps of certified companies and areas or details of who owns them. None of the schemes require full transparency concerning either the ultimate ownership of certified companies or the full extent of the (informal) producer groups to which they may belong. This makes it impossible for buyers to avoid certified suppliers that belong to corporate producer groups involved in unsustainable production of commodities through some of their other, uncertified, subsidiaries. Further, most schemes do not require the provision of maps or data for publication on remaining natural ecosystems or conservation values in certified areas, or publication of details on social conflicts or grievances.

The lack of an unbroken traceability system enabling commodities to be tracked from source to end product and vice versa makes it impossible for certification schemes, let alone downstream companies and consumers, to ensure that destruction or degradation of forests and other ecosystems and human rights abuses are excluded from the production of a commodity.[68] Technology to enable full traceability and transparency exists,[69] including artificial intelligence tools, so feasibility is not the stumbling block – the issue rather seems to be one of reluctance on the part of manufacturers, processors and retailers. This might stem from their unwillingness to pay extra to ensure full segregation,[70] or from a fear that traceability will make it impossible to conceal harmful or destructive practices in commodity production, increasing the pressure on these companies to solve these problems.

Mixing certified with uncertified commodities, allowing deforestation to continue

Even some of the better certification schemes include an option for downstream companies to buy commodities certified under mixed systems such as ‘mass balance’ and ‘book and claim’ (aka ‘certificate trading’).[71]

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[66] RSPO, GeoRSPO [Website]. See the section on the RSPO in Chapter 2 for further details.
[67] FSC, FSC on the map [Website]; see also Worm, L.D. (2019, 5 September)
[68] Smit, H., McNally, R., & Gijsenbergh, A. (2015)
[69] See eg Hirbli, T. (2018) and Saberi, S., et al. (2018).
[70] Where certified feedstock is kept separate from any uncertified feedstock throughout the supply chain. Segregation is one of the most expensive supply chain models to implement, second only to identity preservation (IP). See eg Mol, A., & Oosterveer, P. (2015) and RSPO (n.d.-a) pp.5-6.
[71] See eg Forum Nachhaltiges Palmöl, Trade options [Website].

Under the **book and claim model** (used for example by the RSPO[72]), producers receive 'credits' for each tonne of certified commodity they produce; however, the commodity is then mixed with uncertified product, rather than being segregated or tracked through the supply chain. Downstream companies that have purchased quantities of uncertified commodity on the open market can then buy corresponding quantities of credits, enabling them to claim to be supporting certified production. The revenue from sold credits is intended to encourage and support the transition of producers to adherence to the certification standards.[73]

Under the **mass balance model**, certified commodity is mixed with uncertified commodity throughout the supply chain and this mixed commodity is sold to end users as "certified mixed commodity". Accounting systems track the quantity of certified commodity passing through the supply chain to the market, and in theory only this volume is able to be labelled or claimed as certified. This approach enables the costs of setting up infrastructure for segregated supply chains to be avoided.[74]

Such mixed sourcing models allow supply chains to continue to be filled with commodities associated with deforestation and other social and ecological harms. Companies that purchase commodities or products made from commodities traded through these supply chain models may therefore be inadvertently supporting producers that continue to engage in deforestation and/or human rights abuses. They are also misleading consumers if they claim that the products made with these commodities are 'sustainable'.

Summary reports or results of audit assessments not made public
An important element of transparency and therefore increased accountability and credibility of a certification scheme is the publication of key documents or information relating to the certification assessments. This allows stakeholders to view the performance certified areas against the certification schemes standards and process requirements. There is variation across schemes from no transparency at all to summary reports of audits being made publicly available.

AUDITING

Only part of the supply chain is checked
Certification schemes often only specify performance standards for the primary producer or processor.[75] In the case where there are multiple certificates used in the supply chain, they are often audited by different CBs. The problem is that the audits are done separately, and critical information – particularly concerning certified volumes of the commodity concerned – is not passed down the supply chain and shared with the CBs

[72] RSPO, RSPO supply chains [Website]
[73] SPOTT, GreenPalm: Smallholders [Website]. See also Changing Markets Foundation (2018) p.39.
[74] See eg Forum Nachhaltiges Palmöl, Trade options [Website].
[75] See for example GreenPalm, What is GreenPalm? [Website].

that are auditing the buyers of these products. This creates the opportunity for fraudulent labelling of uncertified material as certified. At present, no scheme has implemented a system that comprehensively tracks the movement or transformation of commodities all the way through the supply chain (the exception is the 'identity preserved' supply chain model, but because of the high costs associated with this system its use is relatively rare[76]). The FSC has developed a transaction verification system, but it is applied only in limited circumstances in relation to risk.[77] This lack of full traceability and volume tracking renders claims made about so-called 'sustainable' certified sources questionable.

Limited independence of certification bodies

It is common practice for certification bodies to be paid directly by the clients they are auditing, who can always choose another CB if they are dissatisfied with the results of an audit. The CBs' financial dependence on the clients they are certifying creates an intrinsic conflict of interest, potentially encouraging them to give unduly favourable audit results in order to keep their clients. As well, auditors may become overly familiar with their clients over time, which might cause them to overlook issues that they have become habituated to seeing.[78]

Contractual obligations between CBs and the companies they certify can also be a complicating factor. Global Witness investigations have revealed that 'contractual obligations between the FSC's certifying bodies and the companies they certify leave them with little power to take action against subsidiaries', because the FSC 'is unable to act as both certifier and complainant'.[79] In some cases such a lack of independence may lead to enabling full-blown corruption, as was recently alleged by Earthsight in their reports on illegal logging in Ukraine.[80]

Research suggests that having a 'firewall' between CBs and their clients improves the strength of environmental standards auditing.[81] There is greater acknowledgement of this issue as threat to certification integrity[82] but with limited examples of alternative approaches, voluntary schemes are reluctant to adopt innovations to address the issue. Proposals include: rotation of the CB and it's auditors, having the certification fee be held in a escow account and withheld until the assessment report has been validated, a tender process after which a third party decides on the CB for a client, flat price audits, and free audits funded by other means or levies.

IMPLEMENTATION

[76] Mol, A., & Oosterveer, P. (2015). See also eg RSPO (n.d.-a) p.5.
[77] FSC, Transaction verification [Website]
[78] Jennings, S. (2016) pp.8-9. See also Duflo, E., et al. (2012), EIA (2015), EIA (2019) and Hines, A. (2014, 12 September).
[79] Hines, A. (2014, 12 September)
[80] Earthsight (2018), Earthsight (2020)
[81] Eg Duflo, E., et al. (2012).
[82] Mike Read Associates (2020) pp. 32-43

Reported violations of certification standards

Certification schemes often fall short not only in their definition of the standards themselves but – even more importantly – in how those standards are interpreted, implemented and enforced. For example, numerous case studies from across forest regions show that RSPO certification has been granted to companies that have been reported to be involved in deforestation, land disputes, destruction of Indigenous livelihoods, agrochemical pollution and cutting communities off from their drinking water supplies.[83]

Weak penalties for companies breaching criteria

When companies breach certification standards, the consequences are not necessarily swift or severe. In some cases the auditors appear inclined to be lenient; in others, audits may fail to pick up issues or take a long time to do so (for example when parts of a farm or concession are audited only every few years). Typically, the most extreme sanction for a very serious breach of a certification scheme's conditions is for a producer's certification to be terminated immediately. The producer's membership in the scheme may also be revoked. For less serious infractions, the certification may only be suspended. However, in practice certificate holders that have breached the principles or criteria of a certification scheme do not normally have their certificates suspended or terminated immediately. Rather, they are given time to achieve compliance, on the questionable basis that engagement with non-compliant companies is a more effective driver of change than excluding them from the scheme. Despite the use of pass/fail certification criteria and indicators, the approach thus involves 'continuous improvement' and 'inclusiveness', while full compliance – and therefore true sustainability – remains a distant goal.

Even if a producer's certification is withdrawn and the producer ultimately suspended or expelled from the scheme, this does not necessarily lead to satisfaction or compensation for communities and individuals who may have lost their land, livelihoods, cultural sites or clean water supply as a result of the producer's activities. Most certification schemes have a dispute or grievance mechanism that enables complaints to be made against certified companies and operations, the CBs and the scheme itself. However, these mechanisms and the cases heard under them are often neither made public nor addressed in a timely and comprehensive manner. Moreover, most schemes do not provide for compensation to be paid to people affected by loss of land or livelihood or other human rights violations, nor do they have mechanisms in place for remediation or restoration of damage to ecosystems. And if they do have any provisions of this kind, their scope and effectiveness are often limited.

Details on the implementation and effectiveness of individual schemes are provided in the following chapter.

[83] See eg Greenpeace (2019a) and World Rainforest Movement (2018, 16 November).

Chapter 2 - Analysis of the major certification schemes

INTRODUCTION

This chapter analyses a number of certification schemes, focusing on five key areas: governance and decision making, standards, traceability and transparency, audits, and implementation and effectiveness. Because there are too many schemes for this paper to be able to consider all of them in detail, the schemes discussed are those that are most widely used and/or that are claimed by governments and corporations to exemplify best practice. The chapter is structured by commodity and focuses on those that currently pose the greatest risk to forests and ecosystems, namely biofuels, cattle, cocoa and coffee, palm oil, soya and wood products. Each of the schemes has also been evaluated against a range of indicators, as shown in the table

COCOA AND COFFEE CERTIFICATION SCHEMES

Fairtrade

Summary

Power sharing at Fairtrade is relatively well balanced. Fairtrade also seems to be one of the better fair trade schemes in operation, currently being the only certification system that guarantees a minimum price safety net for farmers, plus an extra sum for them to invest in business or community projects. However, concern remains about the scheme's actual effectiveness, with a literature review showing mixed results regarding livelihood impacts and pointing to the need for improvement with respect to labour standards on small farms and reducing child labour. Indigenous rights and FPIC are not mentioned in the Fairtrade standard, and audit reports and complaints are not made public, limiting transparency. Certificates are mostly based on the mass balance option, meaning buyers could end up with Fairtrade certified products in their hands whose production nonetheless involved ecosystem conversion or human rights abuses. GMOs are prohibited, but the standard is not very strict on the use of pesticides throughout the operations of a company. Furthermore, the Fairtrade standard's requirements regarding deforestation and other ecosystem destruction are not very clearly defined, making

implementation difficult and limiting its effectiveness in preventing ecosystem conversion.

Governance and decision making

- Decision-making power at Fairtrade is shared between producer networks and national Fairtrade organisations – 'responsible for licensing, marketing, business development and raising awareness in a defined geographic area'[117] – which have equal representation at the General Assembly and on the Board.[118] Power sharing at Fairtrade seems well balanced, especially when compared to other certification schemes.[119]
- Fairtrade is a full member of the ISEAL Alliance and its subsidiary FLOCERT (see 'Audits' below) is a subscriber.[120]

Standards

- The recently revised (2019) Fairtrade standard for small-scale producer organisations has added new requirements on 'Protection of forests and vegetation', 'Prevention of deforestation', and 'Enhancing Biodiversity', which if fully implemented are collectively strong requirements. However, this is questionable given this change has come very late after much deforestation due to cocoa and coffee expansion, the focus on protected areas, ambiguously defined 'carbon storage ecosystems'[121], and reliance on the UN Food and Agriculture Organization (FAO) definition of forest and deforestation which are widely considered problematic.[122] The standard also requires members to 'take measures to protect and enhance biodiversity', but leaves those measures up to the members' discretion.[123]
- Producers who grow a mix of Fairtrade certified and uncertified crops are permitted to use pesticides that appear in Fairtrade's Hazardous Materials List[124] on the uncertified crops. Even pesticides on the Red List (those banned outright from use on Fairtrade crops, as opposed to being permitted only under specified conditions or 'under extreme caution'[125]) are included in this permission, as long as they are not used on fields where Fairtrade crops are grown.[126]

[117] FLOCERT, Glossary: National Fairtrade Organization (NFO) [Website]
[118] Fairtrade International, Our general assembly and board [Website]
[119] Bennett, E. A. (2015)
[120] ISEAL Alliance, Members and subscribers [Website]
[121] The 'Protection of forests and vegetation' requirement (3.2.31, with immediate effect) requires that 'Your members do not cause deforestation and do not destroy vegetation in carbon storage ecosystems or protected areas' – wording which leaves it unclear whether deforestation is prohibited outright or merely in the areas mentioned. The 'Prevention of deforestation' requirement (3.2.32, which for organisations already certified comes into effect from April 2021) and relies of FAO definitions, e.g. Deforestation: 'The conversion of forest to other land use or the permanent reduction of the tree canopy cover below the minimum 10 percent threshold.' Source: Fairtrade International (2019a) pp.28-30.
[122] World Rainforest Movement (2016, 21 September)
[123] Fairtrade International (2019a) p.30
[124] Fairtrade International (2019a) pp.57-71
[125] Fairtrade International (2019a) p.57
[126] Fairtrade International (2019a) pp.24-25

- The standard for small-scale producer organisations prohibits the use of GMOs on Fairtrade crops or other crops grown in the same fields.[127]
- The standard prohibits discrimination, child labour and forced labour but includes no specific mention of Indigenous rights or FPIC.[128]

Traceability and transparency

- The Fairtrade standard for small-scale producer organisations allows a mass balance approach for cocoa, cane sugar, tea and juice.[129] The standard for traders similarly waives the requirement for physical segregation and traceability to producers in the case of these commodities, for which single-site or group-level mass balance accounting is permitted.[130]
- In the case of single-ingredient products sourced using mass balance, Fairtrade requires that, though Fairtrade and non-Fairtrade material may be mixed at some point during the supply chain, the amount of the commodity a company sells as Fairtrade must match the amount purchased.[131]
- The black Fairtrade mark requires all ingredients of a product that are available under Fairtrade conditions to be Fairtrade (eg, in the case of chocolate, not only cocoa but also sugar and – where used – vanilla). If only a single ingredient is sourced as Fairtrade, this is to be indicated by a white Fairtrade sourced ingredient mark.[132]
- Small-scale producer organisations are not required to make available maps of their operations, but they must keep records of the locations and sizes of their members' farms.[133]
- Complaints and allegations of non-compliance can be made either to Fairtrade or to its CB.[134] Fairtrade does not appear to make public details of complaints against or sanctions imposed upon producers or traders.
- Audit reports do not appear to be made public.

Audits

- Fairtrade has only one accepted CB for producers, wholly owned and independently governed subsidiary FLOCERT.[135] FLOCERT is also responsible for the certification of most traders.[136]
- Both announced and unannounced audits (including of subcontracted premises) may be conducted.[137]

Implementation and effectiveness

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[127] Fairtrade International (2019a) pp.32-33
[128] Fairtrade International (2019a) pp.34-39
[129] Fairtrade International (2019a) p.15
[130] Fairtrade International (2019b) pp.19-21
[131] Fairtrade International, The Fairtrade marks [Website]
[132] Fairtrade International, The Fairtrade marks [Website]. UTZ labels refer only to the coffee, cocoa, tea or hazelnuts in a product; see UTZ, The UTZ logos [Website].
[133] Fairtrade International (2019a) p.50
[134] Fairtrade International (2010), FLOCERT, Quality and appeals [Website]
[135] FLOCERT, Roots and role in Fairtrade [Website]
[136] Fairtrade International, How Fairtrade certification works [Website]
[137] Fairtrade International (2019a) p.11

- Fairtrade works only with local and regional cooperative producers and supports small-scale farming. It is currently the only certification system that guarantees a minimum price safety net for farmers,[138] plus an extra sum for them to invest in business or community projects.[139] In a recent comparison of fair trade and ethical labels Fairtrade came out on top, earning top marks in 31 of 45 categories.[140] However, concern remains about the effectiveness of these schemes. A 2016 literature review of the impact of coffee certification programs including Fairtrade on smallholder livelihoods found that there was no consensus about beneficial livelihood impacts. While some studies identified enhanced livelihood assets in particular institutional and contextual settings, causation to the certification was difficult to show. A greater number of studies found either neutral or mixed impacts, and a small number reported negative impacts.[141] Fairtrade has developed a strategy to work towards a living income and identifies this as a key issue,[142] but a recent study found that there is still significant work to do in this area.[143]
- According to the 2018 Cocoa Barometer, Fairtrade and the other major schemes have been unable 'to significantly contribute to ensuring [cocoa] farmers achieving [sic] a living income, reducing child labour, or halting environmental degradation'.[144] A 2017 Overseas Development Institute report commissioned by Fairtrade found that even though Fairtrade certification has financial benefits for small producers, it has 'tended to underestimate and neglect the issue of labour standards on small farms and has not had significant impacts in this area'.[145]

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[138] Bray, J. G., & Neilson, J. (2017)
[139] See eg Fairtrade International, Products: Coffee [Website].
[140] Commerce Équitable France et al. (2020), Martinko, K. (2020, 9 March)
[141] Bray, J. G., & Neilson, J. (2017)
[142] Fairtrade International, Living income [Website]
[143] Commerce Équitable France et al. (2020) p.46
[144] ABVV-FGTB/Horval et al. (2018) p.3. See also SOAS (2014).
[145] Darko, E., Lynch, A., & Smith, W. (2017) p.6

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Onderwerp: Fwd: GP report to check
Van: Grant Rosoman <grosoman@greenpeace.org>
Datum: 19-02-2021, 11:57
Aan: Charlotte van der Tak <charlotte.van.der.tak@greenpeace.org>

Here's the FSC correspondence

-------- Forwarded Message --------
Subject: RE: GP report to check
Date: Mon, 30 Nov 2020 09:50:28 +0000
From: Kim Carstensen <k.carstensen@fsc.org>
To: Grant Rosoman <grosoman@greenpeace.org>
CC: Frank Harnischfeger <f.harnischfeger@fsc.org>, Stefan Salvador <s.salvador@fsc.org>, Karen Bennett Van der Westhuizen <k.bennett@fsc.org>, Dania Musa <d.musa@fsc.org>, Gemma Boetekees <g.boetekees@fsc.org>

Dear Grant,

Thank you for coming back on this. You are welcome to publish our response, if you publish it all and not just parts of it.

As also stated in our response, we are happy to engage with stakeholders on the strengths and weaknesses of FSC and certification. We see a lot of value from such engagement, so your assumption is not correct.

Best regards,

Kim

*From:*Grant Rosoman <grosoman@greenpeace.org>
Sent: Monday, 30 November 2020 01:44
To: Kim Carstensen <k.carstensen@fsc.org>
Cc: Frank Harnischfeger <f.harnischfeger@fsc.org>; Stefan Salvador <s.salvador@fsc.org>; Karen Bennett Van der Westhuizen <k.bennett@fsc.org>; Dania Musa <d.musa@fsc.org>; Gemma Boetekees <g.boetekees@fsc.org>
Subject: Re: GP report to check

hi Kim

thanks for you reply. Disappointing that you don't see any value in engaging around the strengths and weaknesses of FSC and certification. This is a draft and there will be changes made in the final edit. We remain open to addressing any concerns that you want to raise. We are receiving comprehensive responses from other schemes and reviewers.

As common practice for transparency, we would publish your reply in an annex in the report. I presume this is ok with you?

best

Grant

On 11/22/20 12:20 am, Kim Carstensen wrote:

> Dear Grant,
>
> Thank you for the opportunity to comment on your upcoming report. We

appreciate the offer, but found the whole report so biased and skewed against certification – and thereby FSC – that it made little sense to provide comments and fact-check on the direct references to FSC.

We have never claimed that just one tool can fix complex problems such as deforestation, and we are not asking any government to rely on FSC certification as the only tool to use. We see ourselves as a complement to other tools that governments and other actors should promote and use. Therefore, at least in our case, we think the message of the report is far off target.

There are some factual mistakes in the report, but they are actually less damaging than the biased interpretations and statements, so let them stand.

We're happy to discuss the shortcomings of our system and what we're doing to correct them. However, this report isn't a good basis for such a discussion.

Best regards,

Kim

*From:*Grant Rosoman <grosoman@greenpeace.org>
<mailto:grosoman@greenpeace.org>
Sent: Wednesday, 11 November 2020 11:55
To: Kim Carstensen <k.carstensen@fsc.org>
<mailto:k.carstensen@fsc.org>
Subject: GP report to check

hi Kim

See attached letter and report sections provided in confidence for fact check or comment by FSC.

best

Grant

--
Greenpeace Forests Campaign

Global Solutions Senior Advisor

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