



DIN Deutsches Institut für Normung e.
V.



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August 2nd, 2013

Dear Mr. Carstensen and Mr. Gunneberg,

It is with disappointment that we received the statement signed by both of your organizations regarding our proposal on the development of an International Standard about Chain of Custody for Forest Management. We understand that prior to submitting our proposal, ABNT and ISO Central Secretariat, recognizing the importance of FSC and PEFC in this field, shared a draft version of the proposal and discussed the intents of the work with FSC during Rio+20, and with PEFC at ISO Central Secretariat in Geneva. So having been previously informed, we were disappointed to receive such a statement during our enquiry to ISO members.

However, given your statements, we believe there is a misunderstanding as to the aim of the project. Thus we would like to clarify the main objective of this proposal and the rationale behind it.

Firstly, we would like to stress that the initiative is a result of enquiries carried out beforehand regarding the need for such a standard. The respective stakeholders, the timber industry in particular, confirmed that there is great need for action. And as described in our feasibility study such a need seems to be global and urgent.

The primary aim of our proposal is the creation of unified requirements based on best-practice. This will be of great benefit for all users worldwide. On one hand there would be clarity regarding requirements, and on the other hand the need for double certification – which is expensive and time-consuming – would be avoided. Currently around 20% of the CoC certificate holders are both FSC and PEFC certified. This add approximately USD 25 millions in auditing costs and over USD 50 millions in internal controlling process annually. Over the course of the next decade, this will add over ¼ of a Billion USD of controls and audits. This is, from the industry perspective, no minimal cost and cannot be neglected. It is a nuisance for certification holders and not serving the purpose of sustainable managed forests. This could be overcome by just one standard.

Furthermore, we are quite aware of the world-wide developments in timber tracking and securing the legality of wood and wood products, like the US Lacey Act, the EUTR and the Australian Illegal Logging Prohibition Act. Many countries -and the number is increasing- are about to create Voluntary Partnership Agreements with the EU, leading to the installation of national Legality Assurance Systems (LAS). Here, an International Standard might help implement these legal and non-governmental systems.

We would like to emphasize that on no account do we intend to compete with FSC and PEFC, but just the other way around. During the standards development process all stakeholders will be invited to incorporate their practical experience. The aim will be to create a unified, practicable, consensus-based standard. It is our explicit wish that FSC and PEFC are involved in this project. Both organizations are then, later on, free to subsequently use and integrate the standard in their work. This could be of benefit for FSC and PEFC as ISO Standards – due to their global nature – open up world markets.

We hope that these explanations help to clarify the reasoning behind our proposal and we would be more than happy to discuss with both PEFC and FSC our proposal if further input is necessary.

Kind regards,

Ernst-Peter Ziethen

Member of the Management Board
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