

## CLARIFICATION ON THE USE OF FSC COC CERTIFICATES AS VERIFICATION OF GOOD PRACTICE

TFT is a supporter of FSC and seeks to work with forest projects and timber supply chains towards FSC certification.

We have noted an increasing tendency for **some** wood products trading companies to get their wood processing facilities FSC Chain of Custody (COC) certified and to proudly display these FSC COC certificates during marketing and sales meetings. These traders are seeking to associate their brand name with that of the FSC; considered a strong ethical international brand in the wood business. Through this association, they seek to reassure their customers that ALL their products are somehow approved by the FSC and are therefore 'good'.

This indeed may sometimes be the case – there are many companies that have implemented excellent practices in their factories and the forests that supply them – yet it is not guaranteed to be the case in all instances so buyers need to be VERY aware of the reality behind what they're being offered. At its November 2007 meeting, the FSC Board reviewed a DRAFT new policy that may include punitive measures against wood trading companies misusing or misrepresenting their link to the FSC in this and other ways.

The simple fact of the matter is that an FSC COC certificate does not mean anything **per se**; it does not magically impart sustainability to the wood being processed as it passes through the FSC COC certified factory. An FSC COC certificate simply means that the factory has implemented a materials handling process – a tracking system - that allows an auditor to determine that the wood in the end product came from a defined batch of logs at the start of the process. If those logs were genuinely sourced from an FSC certified forest, then the factory FSC COC system allows the auditor to confirm this fact and the factory's end product can be FSC labeled. Yet, if the defined batch of logs were sourced illegally, the FSC COC system merely confirms that the end product is illegal.

Thus, the FSC COC system merely confirms that the factory has installed a tracking system and does not answer the key question – where does the wood come from? Responsible buyers should therefore be wary of what they're being offered because there is a risk that the factory has merely obtained FSC COC certification to 'greenwash' otherwise dubious material. This is not necessarily the case – the factory may have indeed processed FSC material in the past so has indeed installed a genuine FSC COC system, but it places the onus on the buyer to dig deeper to confirm that the raw materials are genuinely FSC certified.

The steps that a buyer can take to ensure that the product being offered is indeed genuinely FSC labeled are outlined in **Box 1** below.

The TFT would be pleased to offer further clarification and to answer any queries on this matter from buyers, traders or forest managers.

**BOX 1: How to determine if the wood you're being offered is genuinely FSC certified product**

FSC certified product MUST be produced in an FSC COC certified factory and the wood raw materials MUST originate in an FSC certified forest. To confirm that the product is genuinely FSC certified and thus correctly FSC labeled, TFT's guidance, in line with FSC requirements, would be:

1. Buyers should request copies of the FSC Forest Management Certificate(s) and copies of corresponding invoice(s) that apply to the raw material used by their suppliers.
2. Buyers should check the validity of this/these certificate(s) on the FSC website (<http://www.fsc-info.org>).
3. Buyers should request a copy of the supplier's FSC COC certificate and ensure that the FSC certificate number is adequately quoted on all corresponding invoice(s) and product.
4. Check the validity of this certificate (<http://www.fsc-info.org>).
5. FSC certificates, packing lists, invoices and other shipping documents should be checked for authenticity and consistency before accepting a shipment and endorsing the corresponding letter of credit.
6. Buyers should also contact the FSC certification body that has issued the FSC certificate (forest or COC or both) to confirm in writing the certified status of a shipment before confirming an order or accepting a shipment.

This guidance is in line with FSC's own guidance regarding good management of FSC Chain of Custody systems (see <http://www.fsc-uk.org/documents>) and will minimise any potential misuse of the FSC trademark on product.

Yet even with these steps, a buyer cannot be 100% certain that the product is genuinely from an FSC certified forest because there are unscrupulous traders that are very adept at photocopying documents whilst using a completely different set of often illegal logs to actually produce the product. To be 100% certain, a buyer should thus arrange, either internally i.e. through his/her company or externally, i.e. through a credible checking organization:

1. Pre-production checks that confirm that the log raw materials MATCH the full FSC document set including making sure that the dimensions on the log list physically match the real dimensions of the numbered logs
2. In-production checks that confirm that only the stipulated FSC logs are being used to produce the product