



WWF International
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Open Letter

17 August 2015

To: Zulfandi Lubis SH.
Executive Director
Indonesian Forest Certification Cooperation
Perkantoran Amsterdam Blok D 56 Sentul City, Bogor

Dear Mr Lubis,

Re: Questions on the basis for IFCC/PEFC certification of plantations in Indonesia

The Indonesian Forest Certification Cooperation (IFCC) recently announced the certification of several pulp plantations in Indonesia. The IFCC is the Indonesian arm of the PEFC (Programme for The Endorsement of Forest Certification) - an international forest certification accreditation system.

WWF welcomes recent progress within Indonesia's pulp sector, including commitments from major producers to reform their practices and take steps to redress the social and environmental legacies of their historical deforestation and peatland development. We also support appropriate and timely recognition of performance by certification schemes.

However, the IFCC certificates could be "jumping the gun" on a journey towards sustainability that has only just begun. It would be a missed opportunity if the IFCC system lacks the rigour and standards to reliably verify how companies are progressing in the implementation of sustainability commitments.

Most of Indonesia's pulpwood plantations were established by clearing natural forests and peatlands, and many are associated with unresolved conflicts with local communities. Given this context, WWF is questioning the grounds on which the certificates were granted. We are asking these questions in an open letter because there is so little in the public domain that allows stakeholders to review the assessments that underpin the IFCC system.

The IFCC standard has several important safeguards related to land clearing and acquisition. For example, land converted after 2010 is only eligible for certification if it does not occur on "environmentally and socially important biotopes" and the areas of converted forest do not "represent more than 5% of the total forest". We wonder how the certification auditors were able to assess compliance with these safeguards, given that the vast majority of plantations in Indonesia were created by clearing natural ecosystems, and significant clearing has occurred since 2010.

The IFCC standard also has important safeguards related to local community and indigenous peoples' rights. For example, it requires the participatory identification of tenure and legal rights for communities with respect to land and forest resources; and respect for their right to give or withhold Free Prior Informed Consent. Forest managers are required to make agreements with communities in a participatory and equitable manner, with consideration of the rights and

obligations of stakeholders, including fair and equitable distribution of incentives, cost and benefits. We wonder how the certification auditors were able to assess compliance with these safeguards, given the many unresolved social conflicts linked to acquisition of land for plantations in Indonesia.

We also question the rigour of assessment of plantation management practices under the IFCC system. For example, what checks are made to ensure the clear-cutting of mature plantations does not impact biodiversity (e.g. sudden appearance of vast open spaces drive elephants and tigers into conflict with surrounding communities), to ensure restoration of buffers in cases where planting was done too close to streams and rivers, or to manage emissions on plantations established on cleared peatlands.

We would welcome your response to the questions raised in this letter. Your response will help us to inform international markets on the degree to which IFCC certification can be relied upon as verification that certified companies are implementing responsible practices.

Yours sincerely,



Rod Taylor,
Director, Forests,
WWF International

cc. Ben Gunneberg, PEFC Council CEO & Secretary General

Efransjah, CEO, WWF Indonesia